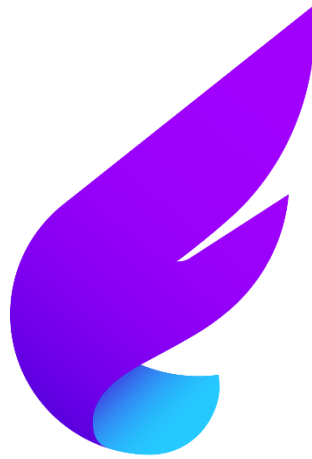


Fontbonne University

Policy Manual Volume II

Campus Community Policies



2020

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Volume II

CAMPUS COMMUNITY POLICIES

2.0 CAMPUS COMMUNITY POLICIES

The policies provided in this Volume II of the Policy Manual pertain to all members of the University community. All members of the University community should read, understand, and comply with all provisions of Volume II.

Volume II was developed to describe some of the expectations of members of the campus community and to outline the policies, programs, and benefits available. The University reserves the right to change these policies and practices at any time and from time to time. The University shall inform members of the University community of changes. Volume II of this manual should not be considered an all-inclusive list of the University's policies.

Policies and benefits set forth in Volume II of this manual are not intended to create a contract, nor are they to be construed to constitute contractual obligations of any kind or a contract of employment between the University and any of its employees or members of the University community. The University hopes that your experience here will be challenging, enjoyable, and rewarding.

Please sign and return the Acknowledgement and Receipt form that is provided in Appendix 2.0.1 to indicate that you have reviewed and will comply with the contents of this and other applicable volumes of the policy manual.

2.1 GENERAL INSTITUTIONAL POLICIES

2.1.1 Institutional Policy on Equal Employment Opportunity

It is the policy of Fontbonne University to afford equal employment opportunity to qualified individuals, regardless of their race, color, religion, age, sex, gender identity, sexual orientation, national origin, disability, or genetic information, and will conform to all applicable state and federal laws and regulations. In keeping with the intent of this policy, the University will adhere to the following personnel practices:

1. Recruitment, hiring, and promotions of individuals in all job classifications will be conducted without regard race, color, religion, age, sex, gender identity, sexual orientation, national origin, disability, genetic information, or any other characteristic protected by law.
2. All other personnel actions such as compensation, benefits, transfers, training and development, educational assistance, and social and recreational programs will be administered without regard to race, color, religion, age, sex, gender identity, sexual orientation, national origin, disability, genetic information, or any other characteristic protected by law.

Overall, responsibility for the development and execution of this policy is delegated to the Vice President for Finance and Administration as EEO Coordinator. The Vice President for Finance and Administration will provide the President with regular EEO activity reports.

2.1.2 Institutional Policy on Discrimination and Harassment

2.1.2.1 NOTICE OF NON-DISCRIMINATION

Fontbonne University does not discriminate on the basis of race, color, religion, age, sex, gender identity, sexual orientation, national origin, disability, genetic information, or any other characteristic protected by applicable law in employment or in the administration of its educational policies, admission policies, educational programs,

scholarship and loan programs, or athletic and other programs and activities. Furthermore, Fontbonne University prohibits retaliation against anyone who either opposes unlawful discrimination, assists or participates in an investigation of a complaint of discrimination, or exercises that person's rights under any law that forbids discrimination.

The Fontbonne University coordinator for Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Titles VI and VII of the Civil Rights Act of 1964 and other laws and regulations prohibiting discrimination is:

Director of Human Resources
Fontbonne University
6800 Wydown Boulevard
St. Louis, MO 63105
Phone: (314) 889-1493
Email: LPipitone@fontbonne.edu

The Fontbonne University Title IX Coordinator and Deputy Coordinators for Title IX of the Education Amendments of 1972 are:

Title IX Coordinator
Carla Hickman, Associate Vice President for Student Affairs
Fontbonne University
6800 Wydown Boulevard
St. Louis, MO 63105
Phone (314) 889-1416
Email: chickman@fontbonne.edu

Deputy Coordinator
Danielle Doerfler
Associate Athletic Director
Fontbonne University
6800 Wydown Blvd.
St. Louis, MO 63105
Phone: (314) 889-4540
Email: ddoerfler@fontbonne.edu

Questions about this non-discrimination policy and any complaints of discrimination shall be directed to the appropriate coordinator. Fontbonne University complies with the Family Educational Rights and Privacy Act of 1974, Public Law 93-380, as amended.

2.1.2.2 ACCOMMODATIONS

Religious Accommodations

Consistent with its commitment to providing equal employment opportunities to all individuals, Fontbonne University will reasonably accommodate an employee's sincerely held religious belief if the accommodation would resolve a conflict between the individual's religious belief or practices and a work requirement, unless doing so would create an undue hardship for the University. Requests for religious accommodations should be directed to the Director of Human Resources.

Fontbonne University prohibits any form of retaliation against an individual for requesting a religious accommodation in good faith.

2.1.2.3 POLICY PROHIBITING HARASSMENT

Harassment based on an individual's race, color, religion, age, sex, gender identity, sexual orientation, national origin, disability, genetic information, or any other characteristic protected by applicable law is not tolerated at Fontbonne University. Harassment consists of unwelcome conduct, whether verbal, physical or visual, that is based on a person's protected status. Examples of harassing conduct may include: epithets, slurs, jokes, teasing, kidding, negative stereotyping, and threatening or hostile acts that relate to an individual's protected status, and physical acts of aggression, assault, or violence, regardless of whether these acts are being, or have been, investigated as criminal offenses by a law enforcement agency.

Any written or graphic material, including any electronically transmitted or displayed material that likewise denigrates or shows hostility toward members of these protected groups is considered harassment. Fontbonne University will not tolerate harassing conduct that:

- a) creates an intimidating, hostile or offensive working or academic environment.
- b) affects tangible employment benefits.
- c) interferes unreasonably with an individual's working or academic environment or performance.

This policy applies to complaints alleging harassment carried out by 1) University employees, 2) University students, and 3) third parties.

Subsections 2.1.2.4 to 2.1.2.7 apply to all claims of discrimination except those for sex or gender discrimination protected under Title IX of the Education Amendments of 1972 ("Title IX"). Provisions governing the processing and complaints of sexual or gender discrimination are prescribed by the Department of Education regulations effective August 14, 2020, and are separately set forth in Subsection 2.2.1.8.

2.1.2.4 REPORTING PROCEDURES - GENERALLY (EXCLUDING SEX AND GENDER)¹

All employees and students have the responsibility to assure that Fontbonne University's non-discrimination and anti-harassment policies are effective. Any University employee or student who experiences, observes, hears, or otherwise witnesses unlawful discrimination or harassment based on a person's protected characteristic as described in Sections 2.1.2.1 and 2.1.2.3, or who receives a report of such unlawful discrimination or harassment of which one or both is carried out by 1) University employees, 2) University students, or 3) third parties must immediately notify the appropriate compliance coordinator ("Coordinator") identified above.

If a report of discrimination or harassment alleges involvement of the Coordinators identified above, then the report of discrimination or harassment may be made to the Vice President for Academic Affairs.

The University will thoroughly and promptly investigate all complaints and take corrective or disciplinary action when appropriate. Likewise, the University will initiate a thorough investigation and take corrective or disciplinary action as appropriate against incidents of discrimination or harassment that come to the University's attention in compliance with this process,

¹ Procedures for the processing of complaints of sex or gender discrimination are set forth in Section 2.1.2.8.

Fontbonne University will investigate every harassment and discrimination complaint thoroughly, promptly and impartially and the parties will be given an opportunity to present witnesses and provide evidence as provided by the process prescribed below. Fontbonne University will evaluate all relevant information and documentation relating to a complaint of discrimination or harassment. All investigations shall be conducted in a sensitive manner and, to the extent feasible, confidentiality will be honored. The investigation and all actions taken will be shared only with those who have a need to know. The investigation findings will be documented, and the complaining individual and the alleged harasser will be kept advised of the progress of the investigation and of the University's final determination. If, after investigation, Fontbonne University determines that an employee or student has engaged in illegal discrimination or harassment, appropriate disciplinary action, up to and including discharge or dismissal, will be taken against the offending individual. Fontbonne University will take prompt steps to prevent recurrence of any harassment or discrimination and correct its discriminatory effects on the complainant and others, as appropriate. In addition, the University will take immediate steps to stop any retaliation and prevent its recurrence against the alleged victim and any person(s) associated with the alleged victim.

In the event that the complaint involves an employee of the University, a complaint of alleged discrimination or harassment may also coincide with a Grievance (see online policy manuals, Volume V, paragraph 5.8). At the discretion of the University Administration, separate investigations may be conducted, or the investigations may be merged. **Where allegations of sexual misconduct, discrimination and/or harassment are brought against a student or student group, they will be handled via the policies and procedures in Subsection 2.1.2.8.** The University will not wait for the conclusion or outcome of a criminal investigation or proceeding to begin an investigation required by this grievance procedure.

2.1.2.5 INVESTIGATION PROCEDURES – GENERALLY (EXCLUDING SEX AND GENDER)

Fontbonne University will provide a prompt, equitable resolution of complaints of discrimination.

2.1.2.5.1 Level I - Informal Procedure

Informal procedures are designed to work out a mutually agreeable solution to a problem and are completely optional and voluntary. Any informal resolution activities will not delay the prompt, adequate, reliable and impartial investigation of the complaint of discrimination or harassment or interfere with the provision of immediate or interim actions, if necessary. Informal procedures are not appropriate for cases involving sexual misconduct and will therefore move immediately to a formal procedure as defined in the below paragraph 2.1.2.5.2.

At the option of the complainant only, it may be possible to resolve a harassment or discrimination complaint through a voluntary conversation between the complainant and the alleged harasser or discriminator, which conversation is facilitated by a University designee appointed by the Vice President for Finance and Administration. If the complainant, the accused, and the University designee feel that a resolution has been achieved through this informal procedure, then no further action need be taken. Fontbonne University recognizes that a voluntary conversation between the complainant and the alleged harasser may not be appropriate for harassment complaints. The results of any informal resolution shall be reported by the University designee in writing, signed by the complainant and the accused, and submitted to the Vice President for Finance and Administration for employee situations and Vice President for Student Affairs for student situations.

2.1.2.5.2 Level II - Formal Procedure

The complainant shall submit a written and signed complaint with the Coordinator which clearly states the particulars concerning each incident of harassment or discrimination, including:

- a) the name and position of the accused
- b) the nature of discrimination or harassment
- c) the date(s) when the alleged harassment or discrimination occurred
- d) the details of the alleged conduct including any information that would support the complaint
- e) the redress that is sought

The University will conduct a prompt, thorough and unbiased investigation into the matters described in the written complain. In the absence of a written complaint, the University will investigate any discrimination or harassment that may come to its attention through an oral report or other method. Such investigation will be considered a formal procedure.

The Coordinator shall inform the Vice President(s) in whose area the accused and accuser are employed of the complaint, or, in the case of students, shall inform the Vice President for Student Affairs.

As noted above, the Coordinator will promptly investigate the complaint or will appoint a University designee to promptly investigate the complaint. The complainant and the accused will each be interviewed, as will witnesses identified by the complainant, accused, or other witnesses, as the University deems appropriate.

Within twenty (20) working days after the conclusions of the final investigation interview, the Coordinator (or University designee, if applicable), will prepare investigation findings and, if appropriate, determine any corrective or disciplinary action to be taken. The Coordinator will inform the appropriate Vice President or Dean of the findings of the investigation. Both the accused and the complainant will be informed in writing of the findings of the investigation by the Coordinator within three (3) working days of the preparation of findings and, if appropriate, determination of corrective or disciplinary action.

2.1.2.6 APPEAL PROCEDURES – GENERALLY (EXCLUDING SEX AND GENDER)

Individuals requesting an appeal of the findings of an investigation of a harassment or discrimination complaint must appeal in writing to the Vice President for Academic Affairs within ten (10) working days of being informed of the findings of the investigation.

If an individual requests an appeal, the appeal must be in writing, and, if applicable, it must cite any alleged procedural or substantive error that occurred during the investigation, if applicable, and provide an account of any new information that has become available since the investigation was conducted.

Within ten (10) working days after receipt of the written appeal, the Vice President for Academic Affairs must meet with the complainant and with the alleged harasser or discriminator. The written decision of the Vice President for Academic Affairs shall be issued within five (5) working days of the latter of these two meetings and shall be final and binding. If the underlying allegations involve the Vice President for Academic Affairs, then written request for appeal shall be made to another member of the Office of the President.

2.1.2.7 RETALIATION PROHIBITED

Fontbonne University prohibits retaliation against any person who makes a complaint of discrimination or harassment, opposes discrimination or harassment, or testifies, assists or participates in an investigation

proceeding or hearing relating to such discrimination or harassment. Retaliation includes, but is not limited to, any form of intimidation, reprisal, harassment or treatment based upon retaliatory motive that is reasonably likely to deter protected activity.

2.1.2.8 PROCEDURES FOR CLAIMS OF SEX/GENDER DISCRIMINATION

Below are the procedures for processing claims of sex and gender discrimination:

2.1.2.8.1 Sexual Harassment Defined

Sexual harassment is unwelcome conduct on the basis of sex that a reasonable person would find to be so severe, pervasive and objectively offensive that it effectively denies a person equal access to the University's education programs or activities. Sexual harassment consists of quid pro quo harassment, hostile environment harassment, sexual assault, dating violence, domestic violence, and stalking.

Sexual harassment may be verbal, physical, visual or electronic and include but not be limited to: unwanted sexual advances; explicit sexual propositions; displaying sexually suggestive objects, pictures or materials; sending sexually suggestive text messages, pictures or other content; sexual innuendo; sexually-oriented verbal abuse; sexually suggestive comments; unwanted contact such as touching, patting, stroking, pinching, or brushing against another's body; sexually oriented kidding, teasing or practical jokes; jokes about gender specific traits; derogatory statements or sexually suggestive postings online or in any social media platform; foul or obscene gestures or language; and physical acts of aggression, assault, or violence, regardless of whether these acts are being, or have been, investigated as criminal offenses by a law enforcement agency (such as rape, sexual assault or battery, and stalking) made against a person's will or where a person is incapable of giving consent due to victim's age, intellectual disability, or use of drugs or alcohol. Sexual harassment also involves inappropriate conduct toward an individual which, although not motivated by sexual desire, would not have occurred except for that person's sex or gender.

2.1.2.8.2 Reporting Procedures

Any person who believes that he or she was the subject of harassment (the "Complainant"), may report sexual harassment to the University's designated Title IX Coordinator. Any person who believes that he or she is aware of others being subject to sexual harassment may report the facts to the Title IX Coordinator. Reports can be made in person, by mail, telephone, e-mail, or any other method approved by the University. Upon receiving actual knowledge of sexual harassment, the University will respond promptly and impartially. The Title IX Coordinator will immediately contact the Complainant to discuss the availability of supportive measures, with or without the filing of a formal complaint, and how the Complainant can file a formal complaint against the alleged harasser ("Respondent"), if he or she so chooses.

The University will not tolerate any retaliatory actions taken by a party after reports of sexual harassment have been made. Retaliatory actions could be intimidation, threats, coercion, or discriminating against any individual for the purpose of interfering with any right or privilege secured by Title IX. Retaliatory actions include, but are not limited to, threats of civil litigation against the Complainant for defamation, or spreading rumors intended to intimidate the Complainant from filing a complaint. Disciplinary action will be taken as necessary.

2.1.2.8.3 Supportive Measures

Upon receiving actual knowledge of sexual harassment, and without the necessity of filing a formal Complaint, the University will immediately contact the Complainant to offer supportive measures at no cost. If a formal complaint is filed, supportive measures will be offered to both the Complainant and the Respondent, without cost. Such measures are not disciplinary in nature and are designed to restore or preserve equal access to education programs. Supportive measures may include, counseling, extensions of deadlines or other course-related adjustments, modifications of work or class schedules, campus escort services, mutual restrictions on contact between the parties, changes in work or housing locations, leaves of absence, increased security and monitoring of certain areas of the campus, and other similar measures. The University will keep confidential any supportive measures provided to the Complainant or Respondent, to the extent that maintaining such confidentiality would not impair the ability of the University to provide the supportive measures.

On an emergency basis, the University may remove a Respondent provided that the University first determines, through an individualized safety and risk analysis, that there is an immediate threat to the physical health or safety of any student or other individual arising from the allegations of harassment. If such order is issued, the University will promptly provide Respondent with notice of the opportunity to challenge and appeal the decision immediately after removal.

The University may also choose to place a non-student employee Respondent on administrative leave during the entire grievance process.

2.1.2.8.4 Formal Complaints

An investigation or proceeding will commence upon the filing of a formal written complaint either 1) prepared and executed by the Complainant or 2) prepared and executed by the Title IX Coordinator or Deputy Coordinator that the report of harassment is not “clearly unreasonable based on the consideration of all relevant factors.” A formal complaint will only be accepted if, at the time of filing, the Complainant is participating in or is attempting to participate in the school’s education programs or activities and the incident is alleged to have occurred at a location where the University exercises substantial control over the event and/or the site. The University will take measures to ensure that no conflicts of interest exist between the Title IX Coordinator, investigators, the decision-maker, or other University officials and any party participating in the grievance process.

If the University receives new allegations at any point during a grievance process, the University will send a detailed written notice to both parties informing them of the new allegations.

2.1.2.8.5 Notice of Commencement of Proceeding

On receipt of a formal complaint, a notice of commencement of proceedings shall be issued to the Complainant and Respondent. The notice of commencement shall include the following:

- a) Notice of the allegations, including sufficient details known at the time and with sufficient time to prepare a response before an initial interview. Details include the identities of the

- parties involved in the incident, if known, the conduct allegedly constituting sexual harassment, and the date and location of the alleged incident, if known. The investigation and hearing process should be described. Absent highly unusual circumstances, the formal complaint should be provided to the Respondent.
- b) A presumption that the Respondent is not responsible for the alleged conduct until a final determination is made at the conclusion of the grievance process.
 - c) A request that the Complainant and the Respondent identify any witnesses to be interviewed for purposes of the investigation.
 - d) A notice to the parties that they have a right to an advisor of their choice, who may be an attorney.
 - e) A warning that any false statements are prohibited and will be subject to disciplinary action.
 - f) That confidentiality is requested, but not to be applied so as to restrict the ability of either party to discuss the allegations or gather and present relevant evidence.
 - g) Each party is entitled to advance notice of any interviews with sufficient time to prepare for participation in the interview.
 - h) Each party has an equal opportunity to inspect and review any evidence gathered during the investigation, including inculpatory and exculpatory evidence, including evidence to be relied upon at a hearing. Each party will have at least ten days to submit a written response to the evidence which the investigator must consider before finalizing the investigation. The decision will be based on an objective view of the evidence and the University participants will have previously had Title IX training and will disclose their training to the parties.
 - i) The investigation will result in a written investigative report that fairly summarizes the investigation. This report is to be issued at least ten days prior to any hearing.
 - j) The standard of review for the hearing will be the preponderance of the evidence, meaning more likely than not.
 - k) Notification that sanctions for a final determination may range from counseling and education to suspension and expulsion.

The grievance process will comply with the above requirements.

2.1.2.8.6 Dismissal of the Proceeding

At any point in the investigation, if the University determines that the conduct alleged in a formal complaint, if assumed true, either 1) does not constitute sexual harassment; 2) did not occur in the University's education programs or activities; or 3) did not occur against a person in the United States, then the University must dismiss the complaint. The University may dismiss the complaint at any time if 1) a Complainant requests, in writing, to withdraw the complaint; 2) the Respondent is no longer

enrolled or employed by the University; 3) specific circumstances prevent the University from gathering evidence sufficient to reach a determination.

2.1.2.8.7 Investigation

The filing of a formal complaint will initiate an investigation. This investigation will ultimately result in the production of an investigative report, and subsequently, a proposed determination of responsibility. During the investigation, the University will provide an equal opportunity for the parties to present witnesses, gather evidence, and discuss the allegations under investigation. Both parties will be provided sufficient time to prepare before an interview is conducted as well as provided advance notice of the date and time of the interview, the location, the identity of participants and the purpose of the interview. Both parties will have the opportunity to inspect and review any evidence obtained as part of the investigation that is directly related to the allegations raised in the formal complaint. Both parties will have at least ten days to submit a written response to the evidence prior to the issuance of an investigative report, and the investigator must consider anything submitted by the parties in issuing the investigative report.

Throughout the investigation, the University will evaluate all relevant information and documentation relating to a complaint of discrimination or harassment. All investigations shall be conducted in a sensitive manner and, to the extent feasible, confidentiality will be honored.

The burden of proof on gathering evidence and finding harassment is on the University. The University may not access a party's health, psychiatric or counseling records without written consent.

A party may elect to be accompanied by an advisor to interviews and meetings. The University may limit the participation of an advisor in any meetings or interviews provided the limitation is imposed on both parties.

The University will fully and impartially investigate all formal complaints until they are either dismissed or the decision-maker or parties arrive at a final resolution.

2.1.2.8.8 Hearings

The University will provide for a live hearing during the process. Written notices will be sent to the parties allowing them sufficient time to prepare for such hearings. All hearings will be live hearings with the University's decision-maker presiding over the process, and each party is entitled to be present with their advisor. If a party does not have an advisor at a hearing, the University must provide an advisor, who may be an attorney, at no cost to that party.

Each party's advisor will be entitled to ask the other party and any witnesses all relevant questions and follow-up questions. Any cross-examination at a hearing must be conducted directly, orally (allowing for appropriate accommodations), and in real time. The decision-maker will determine whether a question is relevant before a complainant, respondent, or witness answers a cross-examination or other question. If the decision-maker finds a questions irrelevant, he or she will explain any decision to exclude that question in real time. If a party or witness refuses to submit to cross examination (including failure to appear at the hearing in person or remotely), the testimony or any evidence provided by that person is to be disregarded and no inference is to be drawn from the failure to appear.

At the request of either party, the University will provide technology to allow for examinations to be done while the parties are in separate rooms. If the parties are in separate rooms, both parties must be able to see and hear the other party through the use of technology. Regardless of the form the hearing takes, a video or audio recording, or a transcript will be created and made available to both parties for inspection and review.

The decision-maker presiding over the grievance process will issue a written document containing the determination of responsibility. The decision-maker will be someone other than the Title IX Coordinator. This final written determination will be distributed to the parties simultaneously and will include the allegations potentially constituting sexual harassment, a description of the procedural steps that occurred throughout the grievance process, findings of fact supporting the determination, conclusions derived from those findings of fact, a statement of, and rationale for, the result of each allegation, and directions as to the procedures and permissible bases for either party to appeal. The Title IX Coordinator is responsible for effective implementation of any remedies.

If the University determines that an employee or student has engaged in harassment, appropriate disciplinary action, up to and including discharge or dismissal, will be taken against the offending individual. The University will take prompt steps to prevent recurrence of any harassment or discrimination and correct its discriminatory effects on the Complainant and others, as appropriate. In addition, the University will take immediate steps to stop any retaliation and prevent its recurrence against the alleged victim and any person(s) associated with the alleged victim.

2.1.2.8.9 Consolidation of Formal Complaints

Where allegations arise from the same facts or circumstances, the University may choose to consolidate formal complaints as to allegations of sexual harassment against more than one Respondent, by more than one Complainant against one or more Respondents, or by one party against the other party.

2.1.2.8.10 Informal Resolution

Upon the filing of a formal written complaint, if the parties agree, the University may attempt to informally resolve the matter, but only with the written consent of the parties and only after the initial notice to all parties has been issued. The University will provide the parties with different informal processes available to resolve the allegations. This may include mediation with the Title IX Coordinator or another person trained in Title IX acceptable to the parties. Prior to any conclusion of an informal resolution process, any party has the right to withdraw from that process and resume the formal grievance process.

An informal resolution process will not be permitted to resolve allegations that an employee sexually harassed a student.

2.1.2.8.11 Appeal Process

Upon a determination of responsibility or dismissal of the complaint, the University will promptly notify both parties of their right to appeal the decision on the following bases:

- a) Procedural irregularity that affected the outcome of the matter;
- b) New evidence that was not reasonably available at the time the determination that could affect the outcome of the matter;
- c) The Title IX Coordinator, investigator(s), or decision-maker(s) had a conflict of interest or bias for or against Complainants or Respondents generally or the individual Complainant or Respondent, that affected the outcome of the matter.

Notice of the appeal will be provided to both parties and the Title IX coordinator. The President of the University or a delegate with Title IX training will be appointed to resolve the appeal but the person may not have been involved in the underlying proceedings or have a conflict of interest with any of the parties. The party filing the appeal must submit a statement of the grounds for the appeal with any supporting evidence within fifteen days of the filing of the appeal. The non-appealing party may submit a response within fifteen days. The appealing party may then respond to the filing of the non-appealing party within 10 days. The resolution of the appeal will require the issuance of a written statement to be provided concurrently to the parties.

The University may also grant an appeal on additional bases at its own discretion. If an appeal is granted on a bases not listed above, it will be granted equally to both parties.

2.1.2.8.12 Retaliation

Retaliation against a party or witness in the proceeding is proscribed. Retaliation is taking adverse action due to a person's participation in the process although the making of any false statement can be subject to discipline. Retaliatory actions could be intimidation, threats, coercion, or discriminating against any individual for the purpose of interfering with any right or privilege secured by Title IX. Retaliatory actions include, but are not limited to, threats of civil litigation against the Complainant for defamation, or spreading rumors intended to intimidate the Complainant from filing a complaint. Disciplinary action will be taken as necessary. Complaints of retaliation under this process will be addressed in the same manner as if the complaint alleged sexual harassment.

2.1.2.8.13 Reporting and Training

The University will maintain records of proceedings under this process for seven years. The Title IX Coordinator will be responsible for such record keeping.

Records of supportive measures taken in response to a report or formal complaint of sexual harassment will also be kept. In each instance, the University will document the basis for its conclusion that its response was not deliberately indifferent, and document that it has taken measures designed to restore or preserve equal access to the University's education programs or activities. If the University does not provide a Complainant with supportive measures, then the University will document the reasons why such a response was not clearly unreasonable in light of the known circumstances.

All participants for the University will ensure that they have Title IX training before commencing to fulfill any responsibility under this process. The participants should be prepared to disclose their training if asked by a party in a proceeding.

2.1.3 Consensual Relations Policy

When two parties have consented at the onset to a romantic or sexual involvement, such consent does not preclude a charge of sexual harassment for subsequent unwelcome conduct of a sexual nature. The educational mission of the University is promoted by professionalism in employee-student relationships. Professionalism is fostered by an atmosphere of mutual trust and respect. Romantic or sexual relationships between University employees and students in a hierarchical relationship may harm this atmosphere, undermine professionalism, and hinder fulfillment of the University's educational mission. Therefore, the University prohibits romantic or sexual relationships between employees and students who are in a hierarchical or reporting relationship and who are not married to each other (i.e. teacher/student, coach/team member, faculty or staff/work study student, etc.).

2.1.4 Family Education Rights and Privacy Act

The following statements relate to Fontbonne University and the Family Educational Rights and Privacy Act (FERPA) of 1974, also known as the Buckley Amendment. Please contact the Registrar's Office at (314) 889-1421 with any questions.

WHAT IS FERPA?

FERPA is a federal law that protects the privacy of student education records. The law applies to all schools that receive funds under the U.S. Department of Education. Education records are records that contain information directly related to a student and that are maintained by an educational agency or institution or by a party acting for the agency or institution. Education records do not include private notes, law enforcement records, medical and counseling records, employment records, or alumni records.

ANNUAL NOTIFICATION

In accordance with FERPA, Fontbonne University will notify students currently in attendance of their FERPA rights annually by publication on the University's website.

2.1.4.1 DEFINITIONS

For the purposes of this policy, Fontbonne University has used the following definitions of terms.

Student – any person who attends or has attended Fontbonne University.

Education Records – any record (in handwriting, print, tapes, film, or other medium) maintained by Fontbonne University or an agent of the University which is directly related to a student, except for:

1. A record kept in the sole possession of the maker of the record that is used only as a personal memory aid and is not accessible or revealed to any other person except a temporary substitute for the maker of the record.
2. Records of an individual who is employed by Fontbonne University that are kept in the normal course of business, relate exclusively to the individual in that individual's capacity as an employee and not available for any other purpose.
3. Records maintained by a Fontbonne University law enforcement unit if the record is created and maintained solely for law enforcement purposes.
4. Records maintained by the Student Health & Counseling Services or other professional or paraprofessional acting in that capacity if the records are used only for treatment of a student and made available only to those persons providing the treatment.
5. Alumni records or former students' records which only contain information about a student after he or she is no longer in attendance at the University.

2.1.4.2 RIGHT TO INSPECT EDUCATION RECORDS

Students have the right to inspect and review their education records upon request to the appropriate record custodian. A student should file a Request to Inspect & Review Education Records form (available on the Registrar's Office website), identifying as precisely as possible the record or records he or she wishes to inspect, with the custodian of the records to which access is desired. If the records are not maintained by the University official to whom the request was submitted, that official will advise the student of the correct official to whom the request should be addressed. The University will comply with a Request to Inspect & Review Education Records request within forty-five (45) days. If access is authorized under FERPA, the records custodian or appropriate University staff person will make the needed arrangements for access and notify the student of the time and place where the records may be inspected.

When a record contains information about more than one student, the student may inspect and review only the records which relate to that particular student.

2.1.4.3 LIMITATION ON ACCESS

Fontbonne University reserves the right to refuse to permit a student to inspect the following records:

1. The financial records of the student's parents.
2. Confidential letters and confidential statements of recommendation related to the student's admission to an educational institution, application for employment or receipt of an honor or honorary recognition for which the student has waived his or her right of access, or which were placed in the student's education records before January 1, 1975.
3. Records connected with an application to attend Fontbonne University if that application was denied.
4. Any records which are excluded from the FERPA definition of education records.

2.1.4.4 REFUSAL TO PROVIDE COPIES

Fontbonne University will provide transcripts or copies of records to any student who, due to reasonable personal circumstances, is unable to inspect and review his/her education records at the location where the records are maintained; Fontbonne University reserves the right to deny transcripts or copies of records to all other students. Fontbonne University also reserves the right to deny transcripts or copies of records not required to be made available under FERPA in any of the following situations:

1. The student has an unpaid financial obligation to the University.
2. There is an unresolved disciplinary action against the student.

2.1.4.5 FEES FOR COPIES OF RECORDS

If a student requests copies of all or a portion of the student's education records and the University determines that such copies are necessary in order for the student to exercise his or her right to inspect and review the records, the fee for such copies will be \$0.20 per page.

2.1.4.6 DISCLOSURE OF EDUCATION RECORDS

Fontbonne University will disclose information from a student's education records only if the student signs a Student Consent for Disclosure of Education Records form (available in the Registrar's Office), except in accordance with FERPA as set forth below:

1. To school officials who have a legitimate education interest in the records.
A school official is:
 - A person employed by the University in an administrative, supervisory, academic or research or support staff position.
 - A person elected to the Board of Trustees.
 - A person employed by or under contract to the University to perform a specific task, such as an attorney or auditor.

- A student serving on an official committee or assisting another school official in performing that school official's tasks.

A school official has a legitimate educational interest if the official is:

- Performing a task that is specified in his or her position description or contract.
- Performing a task related to a student's education.
- Performing a task related to the discipline of a student.

Although school officials are authorized to access this information on a "need-to-know" basis, they are not permitted to release information to persons outside the University unless authorized in writing by the student, by a court order, or according to the exceptions listed in this section. Only the school official or designated person responsible for the records has the authority to release them.

2. To officials of other schools or school systems in which the student seeks to enroll; in this instance, no notice of release of records need to be sent to the student.
3. To authorized representatives of the U.S. Department of Education, the Comptroller General of the United States, the Attorney General of the United States, and state and local educational authorities in connection with an audit or evaluation of certain state or federal supported education programs.
4. In connection with a student's request for or receipt of financial aid, as necessary to determine the eligibility, amount or conditions of the financial aid, or to enforce the terms and conditions of the aid.
5. To state or local officials or authorities if allowed by a state law that was adopted before November 19, 1974.
6. To organizations conducting certain studies for or on behalf of the University.
7. To accrediting organizations to carry out their functions.
8. To a parent when either: (i) regardless of a student's age, the student is claimed by a parent as a dependent on the parent's most recent federal income tax filing; or (ii) the student is under the age of 21 at the time of the disclosure and the parent is seeking information regarding a student's violation of law or school policy on use or possession of alcohol or a controlled substance. *(Note: If a student is claimed as a dependent by either parent, then either parent may have access under this exception, unless the student provides the University with evidence that there is a court order, state statute or other legally-binding document relating to such matters as divorce, separation or custody that specifically revokes these rights.)*
9. To comply with a judicial order or a lawfully issued subpoena. Fontbonne's response to a subpoena will vary depending on the type of subpoena. If: (i) a subpoena is received from a Federal grand jury that has ordered that the existence or the contents of the subpoena or the information furnished in response to the subpoena not be disclosed; or (ii) if Fontbonne receives any other subpoena issued for a law enforcement purpose and the court or other issuing agency has ordered that the existence or the contents of the subpoena or the information furnished in response to the subpoena not be disclosed, Fontbonne will comply with the subpoena without notice to the student or a signed Student Consent for Disclosure of Education Records form. If Fontbonne receives any other type of subpoena, before Fontbonne complies with the subpoena, it will make a reasonable effort to notify the parent or student in advance of compliance with the subpoena, so that the parent or student may seek protective action if they so choose.
10. To appropriate parties in a health or safety emergency.
11. To an alleged victim of any crime of violence. The disclosure may include only the final results of any institutional disciplinary proceeding against the alleged perpetrator of that crime with respect to that crime.
12. In connection with an institutional disciplinary proceeding.

2.1.4.7 RECORD OF REQUESTS FOR DISCLOSURE

Fontbonne University will maintain a record of all requests for and/or disclosures of personally identifiable non-directory information from a student's education records. The record of requests will indicate the name of the party making the request, any additional party to whom it may be redisclosed, and the legitimate interest the party

had in requesting or obtaining the information. The University will create and maintain at each location where education records are kept a record of requests for that location.

2.1.4.8 DIRECTORY INFORMATION

Fontbonne University has designated certain information contained in the education records of its students as Directory Information.

This includes: (1) full name, (2) local and home addresses, (3) local and home telephone numbers, (4) e-mail address, (5) major field of study (6) most recent educational institution attended, (7) enrollment status, (8) class level, (9) dates of attendance, (10) degrees, awards, and honors received, (11) participation in officially recognized activities and sports, (12) weight and height of athletic team members, and (13) photographs.

Fontbonne University may disclose Directory Information for any purpose, without the prior consent of a student, unless the student has forbidden its disclosure in writing. Students wishing to prevent disclosure of the designated Directory Information should file a Request to Withhold Release of Directory Information (available on the Registrar's Office website) with the Registrar's Office within two (2) weeks of the start of the semester. The Request to Withhold Release of Directory Information will stay in effect until the Fall term of the next academic year. The University will assume that a student does not object to the release of Directory Information unless the student files such written notification.

2.1.4.9 AMENDMENT OF EDUCATION RECORDS

Students have the right to ask to have records amended that they believe are inaccurate, misleading, or in violation of their privacy or other rights. Following are the procedures for the amendment of records:

1. A student must ask the appropriate official of the University to amend a record. In so doing, the student should identify in writing the part of the record he/she wants changed and specify why he/she believe it is inaccurate, misleading or in violation of his/her privacy or other rights.
2. The University will either grant or refuse the request within forty-five (45) days. If the University decides not to comply, it will notify the student of the decision and advise him/her of his/her right to a hearing to challenge the information believed to be inaccurate, misleading, or in violation of the student's rights.
3. Upon request, the University will arrange for a hearing, and notify the student, reasonably in advance, of the date, place, and time of the hearing.
4. The hearing will be conducted by a hearing officer who does not have a direct interest in the outcome of the hearing; however, the hearing officer may be an official of the institution. The student shall be afforded a full and fair opportunity to present evidence relevant to the issues raised in the original request to amend the student's education records. The student may be assisted by one or two individuals, including an attorney.
5. The University will prepare a written decision based solely on the evidence presented at the hearing. The decision will include a summary of the evidence presented and the reasons for the decision.
6. If the University decides that the challenged information is not inaccurate, misleading, or in violation of the student's right of privacy, it will notify the student that he/she has a right to place in the record a statement commenting on the challenged information and/or a statement setting forth reasons for disagreeing with the decision.
7. The statement will be maintained as part of the student's education records as long as the contested portion is maintained. If the University discloses the contested portion of the record, it must also disclose the statement.
8. If the University decides that the information is inaccurate, misleading, or in violation of the student's right to privacy, it will amend the record and notify the student, in writing, that the record has been amended.

2.1.4.10 CUSTODIANS OF EDUCATION RECORDS

The following is a list of the types of education records that Fontbonne University may maintain, their locations, and their custodians.

<u>Types</u>	<u>Location</u>	<u>Custodian</u>
Admission Records of Matriculated Students	Registrar's Office Ryan Hall	Registrar
Academic Records	Academic Affairs Office Ryan Hall	Vice President for Academic Affairs
	Department Chair's Office	Department Chair
	Faculty Offices	Faculty Member
	Registrar's Office Ryan Hall	Registrar
Financial Records	Accounting Office Ryan Hall	Controller
Financial Aid Records	Financial Aid Office Ryan Hall	Director of Financial Aid
Disciplinary Records (non-academic)	Student Affairs Office Medaille Hall	Vice President for Student Affairs
Occasional Records (Education records not included in the types above such as minutes of faculty committee meetings, copies of correspondence in offices)	The appropriate office will collect such records, direct the student to their location or otherwise make them available for inspection and review	The University staff persons who maintain such occasional systems records

2.1.4.11 RIGHT TO FILE A COMPLAINT

Students have the right to file a complaint with the U.S. Department of Education concerning alleged failures by the University to comply with the requirements of FERPA. The name and address of the office that administers FERPA is:

Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW
Washington, DC 20202-4605
Email: ferpa@ed.gov
Web: www.ed.gov/policy/gen/guid/fpcg

2.1.5 Institutional Policy on Disability

2.1.5.1 ACCOMMODATIONS FOR INDIVIDUALS WITH DISABILITIES

Fontbonne University complies with the Americans with Disabilities Act, the Rehabilitation Act and other applicable state and local laws. Consistent with those requirements, the University will reasonably accommodate qualified individuals with disabilities if such accommodation would allow the individual to perform the essential functions of his or her position, unless doing so would create an undue hardship for the University. Requests for disability accommodations should be directed to the Academic and Disabilities Resources Coordinator in the Kinkel Center.

Fontbonne University prohibits any form of retaliation against an individual for requesting a disability accommodation in good faith.

2.1.5.2 POLICY FOR EMPLOYING PEOPLE WITH DISABILITIES

It is the policy of the University to comply with the applicable laws that forbid discrimination in employment against qualified individuals with disabilities.

2.1.5.3 STUDENTS WITH DISABILITIES

Fontbonne University offers accommodations to students with documented physical, visual, hearing, learning, or psychiatric disabilities or impairment. Any Fontbonne student is eligible for special services or accommodations if:

1. The student self-identifies that he or she has a disability and needs accommodation.
2. The student provides appropriate and verifiable documentation of the disability.
3. The student provides notification in a timely fashion.

For accessibility and resident hall needs, contact Student Affairs at 889-4523. For academic accommodations, contact the Kinkel Center for Academic Resources at 889-4571.

2.1.5.3.1 Discriminatory Acts Prohibited by the ADA

Colleges and universities receiving federal financial assistance must not discriminate in the recruitment, admission, or treatment of students. Students with documented disabilities may request modification, accommodations, or auxiliary aids that will enable them to participate in and benefit from all post-secondary educational programs and activities. Post-secondary institutions must make reasonable accommodations when possible to ensure that the academic program is accessible to students with disabilities.

Universities and colleges may not:

1. Limit the number of students with disabilities admitted;
2. Make pre-admission inquiries as to whether or not a student is disabled;
3. Use admission tests or criteria that inadequately measure the academic qualifications of disabled students because special provisions were not made for them;
4. Exclude a qualified student with a disability from any course of study;
5. Limit eligibility to a student with a disability for financial assistance or otherwise discriminate in administering scholarships, fellowships, internships, or assistantships on the basis of disability;
6. Counsel a student with a disability toward a more restrictive career;
7. Measure student achievement using modes that adversely discriminate against a student with a disability; or,
8. Establish rules and policies that may adversely affect students with disabilities. (List is from the American Council on Education).

2.1.6 Policy and Procedures for Service Animals

2.1.6.1 RATIONALE

Fontbonne University (the University) complies with Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA) and Americans with Disabilities Act Amendments Act of 2008 (ADAAA), and other applicable state and local laws. Section 504, the ADA, and the ADAAA requires Fontbonne to make reasonable modifications to its policies, practices, or procedures to permit the use of a service animal by a student, faculty, staff, or visitor with a disability.

2.1.6.2 DEFINITIONS

The ADA defines a Service Animal as “any dog that is individually trained to do work or perform tasks for the benefit of an individual with a disability including a physical, sensory, psychiatric, intellectual, or other mental disability.” Importantly, other species of animals, whether wild or domestic, trained or untrained, are not Service Animals for the purposes of ADA. However, under certain conditions, Fontbonne will make reasonable modifications for a miniature horse that has been individually trained to do work or perform tasks for the benefit of the individual with a disability.

When assessing whether a dog is a Service Animal individually trained to do work or perform tasks for the benefit of an individual with a disability, the dog must be trained to do work or perform tasks that are directly related to the individual’s disability. Examples of work or tasks include, but are not limited to, the following:

- assisting individuals who are blind or have low vision with navigation and other tasks;
- alerting individuals who are deaf or hard of hearing to the presence of people or sounds;
- reminding an individual with depression to take his or her medication;
- pulling a wheelchair;
- detecting the onset of a seizure and then helping the individual to remain safe during a seizure;
- alerting an individual to the presence of allergens;
- alerting an individual with diabetes when his or her blood sugar reaches high or low levels;
- retrieving items such as medicine or the telephone;
- providing physical support and assistance with balance and stability to individuals with mobility disabilities;
- assisting persons with psychiatric and neurological disabilities by preventing or interrupting impulsive or destructive behaviors.

Emotional support, therapy, comfort, and companion animals are not considered Service Animals because they have not been trained to perform a specific job or task.

2.1.6.3 DETAILED POLICY STATEMENT

2.1.6.3.1 Verification of Service Animals

Fontbonne will not ask about the nature or extent of an individual’s disability. However, when it is not readily apparent that the dog identified by the individual with a disability is a Service Animal, the Kinkel Center may ask the individual (1) whether the dog is required because of a disability and (2) what work or task the dog has been trained to perform.

Students, faculty, staff, and visitors with a disability are not required to register a Service Animal with the Kinkel Center as a precondition to the University allowing the Service Animal on campus or allowing the Service Animal to attend a University program or activity.

2.1.6.3.2 Care and Supervision of Service Animals

The handler is responsible for the care and supervision of a Service Animal. The handler may be the individual with a disability or a third party who accompanies the individual with a disability. The Service Animal must be under the control of the handler at all times and must have a harness, leash, or other tether. If the use of a harness, leash, or other tether would interfere with the performance of the work or tasks performed by the Service Animal or is impractical because of an individual's disability, a harness, leash, or other tether may not be required. However, in that case, the individual must be able to control the Service Animal by other effective means, such as voice controls or signals.

A Service Animal is generally permitted to accompany the individual with a disability to Fontbonne facilities where members of the public, students, staff, and faculty are allowed to go. However, Fontbonne may ask the handler to remove a Service Animal from any of its facilities if the Service Animal is out of control and the handler does not take effective action to control it. For example, a Service Animal should not be allowed to bark repeatedly in a lecture hall, theater, library or other quiet place. However, if the dog barks just once, or barks because someone has provoked it, this would not mean that the dog is out of control. The University may also ask the handler to remove a Service Animal from any of its facilities if the Service Animal is not housebroken, or if the use or presence of the Service Animal poses a direct threat to the health or safety of others, or if the Service Animal has a history of such behavior.

Fontbonne may impose legitimate safety requirements on the use or presence of a Service Animal that are necessary for safe operation of its facilities. There are some facilities that are not safe for use or presence of Service Animals and from which Fontbonne may exclude Service Animals on a case-by-case basis based on actual risks.

The individual with a disability must abide by current city, county, and state ordinances/laws/regulations pertaining to licensing, vaccination, and other requirements for animals. It is the individual's responsibility to know and understand these ordinances, laws, and regulations. The handler is responsible for cleaning up after and properly disposing of the animal's feces in a safe and sanitary manner.

2.1.6.3.3 Requesting a Reasonable Accommodation

Students, faculty, staff, or visitors wishing to use a Service Animal on campus should contact the Kinkel Center for Student Success, Undergraduate Advising and Engagement at 314-889-4682. The Kinkel Center will consult and collaborate with Human Resources for cases involving faculty, staff, or visitors.

2.1.7 Policy and Procedures for Personal Assistants and Personal Care Attendants

2.1.7.1 INTRODUCTION

Fontbonne University ("the University") complies with Section 504 of the Rehabilitation Act of 1973 (Section 504), the Americans with Disabilities Act of 1990 (ADA), the Americans with Disabilities Act Amendments Act of 2008 (ADAAA) and applicable state law regarding individuals with disabilities. The University is committed to providing accommodations to an otherwise qualified individual with a disability by making a reasonable modification in its services, programs or activities. The University understands that the use of a Personal Assistant (PA) or Personal Care Attendant (PCA) may be an integral part of some students' abilities to participate in the university experience. This policy addresses the use of Personal Assistants and Personal Care Attendants by qualified students with disabilities.

2.1.7.2 DEFINITIONS

Student with a Disability means an otherwise qualified individual who has a physical or mental impairment that substantially limits one or more major life activities of the individual.

Personal Assistant (“PA”) means as a person who assists the student in the classroom. This assistance may include, but is not limited to, in turning pages, retrieving books, assisting with homework, transcribing notes, assisting with augmentative communication devices, or getting the student to and from class.

Personal Care Attendant (“PCA”) means a person who performs personal care duties or services for a student with a disability. These duties or services that the PCA performs is comparable to those that family members would perform for the student with a disability and will vary from person to person. These activities may include, but are not limited to, providing help with activities of daily living, such as bathing, walking, dressing, feeding, toileting, grooming, preparing meals and feeding; monitoring any medical condition by observing vital signs; reminding to take prescribed medications; transporting or escorting the student; opening doors; alerting the student to distracting, repetitive movements; alerting the student to dangerous environments or situations; assisting with light cleaning, laundry, and keeping the environment safe; and other physical assistance.

2.1.7.3 DETAILED POLICY STATEMENT

2.1.7.3.1 RESPONSIBILITIES OF THE UNIVERSITY

It is the responsibility Fontbonne University to provide required accommodations to an otherwise qualified individual with a disability by making reasonable accommodations in its services, programs, or activities to qualified students with documented physical, visual, hearing, learning, or psychiatric disabilities. A modification is not a reasonable accommodation if it causes an undue hardship on the University.

The University is not responsible for providing a PA or PCA to any student or for paying a student’s PA or PCA. Additionally, the University is not responsible or liable for any adverse consequences resulting from a student’s association with a PA or PCA. Additionally, the University is not responsible for providing services to meet the personal needs of the student, which may include, but are not limited, to transfer from a vehicle to a wheelchair; transportation to or from the classroom; administering medication; and addressing toilet, feeding, dressing or grooming needs.

The University may, but is not required to, generate ideas for advertising resources on campus and in the community for a student who is seeking a PA or PCA.

The University believes that it is beneficial if the PA or PCA is impartial and not a family member or close friend of the student, although this is not a requirement.

2.1.7.3.2 RESPONSIBILITIES OF THE STUDENT PRIOR TO APPROVAL OF THE PA OR PCA

It is the student's responsibility to hire his or her PA or PCA and to pay for or otherwise secure funding for the services provided by the PA or PCA. Students must also follow the University's Approval Process, below. A student cannot bring a PA or PCA onto campus until the Approval Process has been completed and approved, except during the initial University registration process.

2.1.7.3.3 APPROVAL PROCESS

- The student must notify the University's Accommodations Coordinator/Section 504 Coordinator (hereinafter "Coordinator") of the student's need for a PA or PCA.
- The student must complete Fontbonne University's Request for Academic Accommodations form and submit it to the Coordinator.
- The student must provide a certification from his or her health care provider addressing the medical necessity of the PA or PCA to the Coordinator.
- If employed by an agency or organization, the PA or PCA must provide a letter of reference from his or her employer, along with the contact information for his or her direct supervisor.
- If employed directly by the Student/Student's family, the PA or PCA must provide a personal or professional letter of reference.
- If the PA/PCA resides in the residence halls, a criminal background check of the PA or PCA will be conducted, paid for by the student.
- If the PA/PCA resides in the residence halls, a drug test of the PA or PCA will be conducted, paid for by the student.
- If each of these steps are followed and approved by Fontbonne University, and results of the criminal background check and drug test (if applicable) meet the satisfaction of Fontbonne University, then:
 - This Policy, Fontbonne University's Campus Community Policies, and other applicable policies will be provided to the PA or PCA (either hard copies or electronic links) and the student.
 - The Personal Assistant / Personal Care Attendant Agreement and Liability Waiver ("Agreement and Waiver") will be provided to the PA or PCA.
 - If the PA or PCA accepts and signs the Agreement and Waiver, the University will sign and approve the Agreement and Waiver, absent extenuating circumstances.
 - The PA or PCA will be provided with a Fontbonne identification card.
 - A new Agreement and Waiver must be submitted by the PA or PCA at the start of each University - school year.

2.1.7.3.4 RESPONSIBILITIES OF THE STUDENT AFTER THE APPROVAL OF THE PA OR PCA

- The student must complete all required paperwork for the PA or PCA to access the University residence halls, if applicable.
- The student must direct the activities of the PA or PCA while at Fontbonne University.
- The student must have an alternative plan of action should the regular PA or PCA not be available to work with the student on a particular day or in a particular class.

- The student must notify the University's Coordinator of any changes in PA or PCA prior to attending scheduled classes.
- The student must comply with this Policy, all other applicable University policies and the Student Code of Conduct.
- If the student's relationship with the PA or PCA ends, or if the student hires a different PA or PCA during the course of any given University term, the student must immediately inform the Coordinator.

2.1.7.3.5 RESPONSIBILITIES OF THE PERSONAL ASSISTANT/PERSONAL CARE ATTENDANT

It is the responsibility of the PA or PCA to:

- Follow this Policy, all other applicable University policies, procedures, rules, and regulations.
- Comply with the terms and conditions of the Personal Assistant/Personal Care Attendant Agreement and Liability Waiver in effect.
- Allow the student to take responsibility for their own progress in class by not providing tutoring or intellectual assistance on exams, essays, class projects or other academic work.
- Remain outside of the classroom/designated area and wait for the student unless providing aid in the classroom is part of the PA's or PCA's approved duties or services.
- Refrain from participating in class discussions or otherwise disrupting class sessions.
- Refrain from engaging in or intervening in conversations between the student and faculty, staff, or other students.
- Refrain from discussing any medical or other confidential information about the student with any Fontbonne University faculty member, staff, or student, with the exception of the Coordinator.
- A PA or PCA is not permitted to proctor the student's tests without the approval of the Coordinator.

STUDENT NAME & FONTBONNE ID NUMBER: _____
PERSONAL ASSISTANT FULL NAME: _____
PERSONAL CARE ATTENDANT FULL NAME: _____

PERSONAL ASSISTANT / PERSONAL CARE ATTENDANT
AGREEMENT AND LIABILITY WAIVER
(“AGREEMENT AND WAIVER”)

I, _____, wish to serve as a Personal Assistant (“PA”) or Personal Care Attendant (“PCA”) for the student identified above (“Student”) so that the Student may fully participate in academic and other programming on Fontbonne University’s campus for the 202_ school year.

I understand that upon the successful conclusion of the Approval Process described in the Policy and Procedures for Personal Assistants/Personal Care Attendants, I will be issued a Fontbonne University identification card for the sole purpose of serving in my role as a PA or PCA for the student identified above (“Student”). I must keep the identification card on my person at all times while at Fontbonne University. In the event that my role as PA or PCA for the Student ends, I will immediately surrender my Fontbonne University identification card, and any other items that Fontbonne University may have issued to me, to the Accommodations Coordinator/Section 504 Coordinator (hereinafter “Coordinator”).

I understand that while I am on Fontbonne University’s campus performing my duties as a PA or PCA, I am required to conduct myself in an appropriate, courteous and professional manner and act in accordance with Fontbonne University’s policies, procedures and practices. Without limiting the generality of the foregoing sentence, I understand and agree that as a PA or PCA for the Student:

- I am responsible for complying with Fontbonne University’s Policy and Procedures for Personal Assistants/Personal Care Attendants, Fontbonne University’s Campus Community Policies, as well as all other applicable policies of Fontbonne University.
- If I drive a vehicle to Fontbonne University’s campus, I must register the vehicle with Fontbonne University’s Office of Public Safety and park in designated parking areas. I am responsible for the payment of all parking fees or fines incurred (unless otherwise agreed by me and the Student/Student’s family).
- I may participate in a Fontbonne University meal plan if I choose to do so. I understand that I am responsible for the payment for the meal plan (unless otherwise agreed by me and the Student/Student’s family).
- I understand that I am prohibited from having guests on Fontbonne University’s campus while I am performing my duties as a PCA or at any other time (with the exception of events or activities that are open to the public).
- I am permitted to be on campus with the Student, and only when the Student is on campus.
- I understand that Fontbonne University will not reimburse for any costs associated with living, dining, or any other expense related to my role as a PA or PCA.

I represent and warrant that I have read and understand this Agreement and Waiver, am of sound mind, and have legal authority to sign this document. I freely accept and assume all risks that may arise from serving as a PA or PCA as described in this Agreement and Waiver, including but not limited to the risk that I may suffer property damage, illness, serious injury, or even death.

In consideration of Fontbonne University permitting me to serve as a PA or PCA for the Student on Fontbonne University’s campus, and to the fullest extent permitted by law, I, on behalf of myself and my executors, heirs, successors and assigns, hereby release and discharge forever Fontbonne University and its

trustees, directors, officers, employees, agents and representatives (collectively, the “Releasees”) and their respective successors and assigns from any and all liabilities, claims, actions, rights, demands, causes of action, damages and expenses of any kind or nature, including but not limited to claims for property damage, personal injury and death, due to the negligence of Fontbonne University, whether known or unknown, past, present or future, directly or indirectly arising out of or in any way connected with my role as a PA or PCA for the Student, as described in this Agreement and Waiver and in Fontbonne University’s Policy and Procedures for Personal Assistants/Personal Care Attendants.

I understand that if I fail to comply with the terms of this Agreement and Waiver or act in a manner that Fontbonne University determines is inappropriate, I may be subject to removal from the residence halls, (if applicable), banned from Fontbonne University’s campus, or subject to any other action that Fontbonne University deems appropriate, in its sole discretion.

I understand that my PA or PCA relationship, including any employment or services agreement, is between myself and the Student/Student’s family and/or any agency or organization by which I am employed in my role as PA or PCA for the Student. I understand that I have no employment, independent contractor, joint venture, or any other working relationship with Fontbonne University.

I have read, I understand, and I voluntarily agree to the terms of this Agreement and Waiver. I understand that this Agreement and Waiver applies only to Fontbonne University’s 202_ school year. If the Student/Student’s family and I wish to continue my role as a PA or PCA for the Student beyond this term, I understand that a new Agreement and Waiver will be required.

I understand that my failure to comply with the Policy and Procedures for Personal Assistants/Personal Care Attendants, other applicable policies, procedures, rules and regulations of Fontbonne University, or this Agreement and Waiver, may result in the termination of this Agreement and my role as a PA or PCA for the Student.

PA or PCA Signature _____
Date _____

Address _____ Birth _____
Date _____

Phone
Number(s) _____

Email Address(es)

Student Signature _____
Date _____

APPROVED by Fontbonne University:

Date _____
Name _____ Title _____

2.1.8 External Grants Policy

All applications for grants must be submitted through Advancement and the Director of Grants for institutional review before submission to a grant maker or sponsor. Appendix 2.1.8 contains policies and procedures concerning grants management.

2.2 HEALTH RELATED POLICIES

2.2.1 Serious Disease Policy

Employee or students with infectious, long-term, life-threatening, or other serious diseases may continue their work or attendance at the University as long as they are able to perform the essential duties of their job or meet their academic responsibilities without posing a direct threat to themselves or others.

The University will support, where feasible and practical, educational programs to enhance employee and student awareness and understanding of serious diseases.

2.2.2 Tuberculosis Policy

2.2.2.1 PURPOSE

The purpose of this policy is to help avoid an outbreak of tuberculosis on campus and to comply with Missouri state law. The policy applies to all new students, faculty, and staff of Fontbonne University and in some cases to returning students, faculty and staff (i.e. participation in a service trip to a high prevalence country). The policy is established in accordance with applicable regulations and requirements.

2.2.2.2 RISK SCREENING POLICY

All new students, faculty and staff are required to complete a screening questionnaire to assess their risk factors for tuberculosis.

The risk screening questionnaire will be sent to all new students, faculty and staff of Fontbonne upon class registration or for new employees, during new hire orientation. The Student Affairs Department will be responsible for documenting completion of student questionnaires. The Human Resources Department is responsible for faculty and staff questionnaires. The forms will be placed in student files and new employee personnel files. The following information will be documented for students, faculty and staff:

- Date the questionnaire was received and evaluated
- Number of “yes” responses checked on the questionnaire
- Copy of completed questionnaire

With the exception of new international students and new resident students, new students, faculty and staff whose questionnaires contain all “no” responses shall be deemed NOT to be at risk for tuberculosis. No additional testing/screening/treatment is required, and registration/employment may proceed.

Anyone who has one or more “yes” responses must undergo further evaluation and testing at their own expense to determine if they have tuberculosis. Students will not be allowed to register for the next academic term until further testing has been completed, and there will be an administrative hold placed on their account. Faculty and staff with one or more “yes” responses will be required to undergo further testing to continue employment, and will be placed a probationary period which may or may not coincide with the initial 90-day orientation period.

2.2.2.3 TESTING POLICY

Students, faculty and staff required to undergo further testing (at their own expense) to determine whether they have tuberculosis may avoid further testing if they can provide documented negative results of a tuberculin skin test done in the United States in the last six months and no risk factors were identified. Students, faculty and staff who have a history of positive tuberculin skin tests or previous tuberculosis disease should provide documentation of appropriate evaluation and treatment as indicated. The Student Affairs Department will notify students who need additional testing and/or documentation within the first two weeks of the current academic term. The additional testing and/or documentation must be completed as soon as possible. Students who fail to comply with the request for additional testing and/or documentation may be dropped from future classes and future registration restricted until compliant. In the case of new faculty or staff, continued employment is dependent upon compliance with the request for additional testing.

2.2.2.4 TESTING PROTOCOL

Students, faculty and staff who answer “yes” to one or more questions on the risk screening must follow this protocol:

1. Tuberculin skin testing is required for all students, faculty and staff who answered “yes” to one or more questions on the risk screening unless there is documented evidence from the United States that a test was done in the previous six months and no risk factors were indicated. Once notified of the need to be tested, the test must be done within two weeks.
2. A positive tuberculosis test will necessitate the need for additional testing, including a chest x-ray and physical exam by a certified healthcare provider with an emphasis on signs and symptoms of tuberculosis. Results must be provided to the Student Affairs Department or Human Resources Department within one week of the positive tuberculosis skin test.
3. Students, faculty and staff who have a positive tuberculosis test but a negative chest x-ray and a negative physical exam will be deemed to meet the criteria for latent tuberculosis infection. Treatment may be recommended, and if refused, an annual evaluation will be required to register for classes and/or continue employment.
4. The Student Affairs Department or Human Resources Department will notify the local health department of any positive tuberculosis test and abnormal x-ray to seek further guidance.
5. If further testing determines that tuberculosis is not active, a diagnosis of latent tuberculosis infection is assumed for purposes of documentation, and treatment is recommended. If the student, faculty or staff member refuses treatment or does not complete treatment, it must be documented by the Student Affairs Department or Human Resources Department. An annual symptom evaluation is required if a student, faculty or staff member refuses treatment in order to continue with registration or employment.
6. If further testing results in active tuberculosis that is not contagious (as determined by the local health department), treatment must be undertaken in order to remain enrolled or employed. Strict adherence to treatment is expected; failure to do so may result in students being removed from classes and/or employees being suspended from active employment.
7. A diagnosis of active, contagious tuberculosis will necessitate that Fontbonne work closely with the local health department to isolate and treat the infected student, faculty or staff member and to identify and test people who have been exposed to the contagious student or employee. An appropriate communication plan will be developed to inform the campus community of the diagnosis of active tuberculosis. Students or employees with an active, contagious diagnosis will not be allowed on campus until certified to return to campus by the local health department.
8. Any additional testing and/or treatment required will be at the individual’s expense.

The Student Affairs Department and Human Resources Department will initiate any campus wide communications via the Vice President of Marketing and Communications regarding tuberculosis on campus in accordance with appropriate protocol outlined by Fontbonne as well as the local health department.

Any information obtained as a result of this policy will be maintained subject to policies adopted by Fontbonne University to protect your privacy.

2.2.3 ALCOHOL AND DRUG ABUSE PREVENTION POLICY

It is the goal of Fontbonne University to promote a drug-free living and learning environment. In accordance with the mandate of federal legislation, the manufacture, distribution, possession or use of illicit drugs, and the unlawful possession, use or distribution of alcohol on Fontbonne University property and off-site campus locations or as a part of any of its activities is prohibited. Violations of the policy will be handled according to procedures covering the conduct of administrators, faculty, students and staff.

2.2.3.1 STANDARDS OF CONDUCT - ILLICIT DRUGS

The unlawful manufacture, possession, distribution or use of illicit drugs on Fontbonne University property or as a part of any of its activities by students, employees, or their guests is prohibited.

2.2.3.2 STANDARDS OF CONDUCT – ALCOHOL

The possession and use of alcohol by persons under the age of 21 years is prohibited. University policies limit the lawful use of alcohol by persons 21 years of age or older to specific occasions and designated locations. Students are responsible for their behavior, and students and organizations will be held accountable for any misconduct related to the use of alcohol. In the event of violations of alcohol policies, students will be subject to disciplinary action. In addition, Fontbonne may notify the student's parents or guardian of the violation if the student is under 21 years of age and in some cases if the student is 21 years of age or older.

1. No alcoholic beverages are allowed in unapproved areas without special permission. Unapproved areas include but are not limited to lounges, hallways, courtyards, and outside of buildings. In addition, St. Joseph's Residence Hall is designated as an alcohol-free building: no alcoholic beverages are allowed by residents or guests, even if they are 21 or older.
2. While Fontbonne respects students' right to privacy, it retains its right to enter any residence hall rooms if there is sufficient reason to believe that University policies have been violated.
3. While responsibility for personal patterns of alcohol use is essentially that of the individual, there are ethical and value issues related to the use of alcohol. Alcohol misuse and abuse can lead to academic failure, physical and psychological dependency, organ damage, and threats to student safety and well-being. The Fontbonne community is called upon to be responsible and responsive to those who are in the developmental process of forming their own codes of personal behavior. The Student Affairs Office offers prevention and intervention alcohol awareness programs, literature, personal counseling and off-campus referrals for assistance with alcohol-related concerns.

2.2.4 Alcohol Serving Policies and Procedures

2.2.4.1 ALCOHOL SERVING POLICY

Due to safety/health concerns for all involved and due to liquor license restrictions from the State of Missouri, St. Louis County, and the City of Clayton, any "Event Sponsor" (defined as any Fontbonne University individual,

organization, or department, or any non-affiliated campus individual or group that plans to serve alcohol at an on-campus Fontbonne event, including at any satellite campus such as Fontbonne University – West Campus or at a Fontbonne leased property location) must make arrangements through our food service vendor, Aladdin Food Management Services (“Aladdin”), which holds the liquor license for the Clayton campus. Event Sponsors must provide 20 business days advance notification in requesting Aladdin to have and/or serve alcohol at any such event.

2.2.4.2 ALCOHOL SERVING PROCEDURES

- A. Bartenders/servers must be used to serve alcohol at any event/gathering and must be contracted through Aladdin. Aladdin will provide one (1) bartender per seventy-five (75) people. The Catering Manual states there is a \$150.00 flat fee for a bartender with a four hour minimum and a \$50.00 charge for each hour above the required minimum. The organization or department sponsoring the event will be billed for the bartenders’ service. There cannot be a cash exchange.
 - 1. Sponsors may request Aladdin to make an exception to the above bartender/server requirements in cases where the event/gathering will comprise of 15 people or less and the event will be closely monitored by the Event Sponsor personnel in attendance. Aladdin, in consultation with the Associate Vice President for Student Affairs, can waive the bartender/server requirement per their discretion following a careful review of the requested event.
- B. Event Sponsors wishing to use an outside caterer (“Caterer”) other than Aladdin to serve alcohol must follow these guidelines:
 - 1. Event Sponsors must request initial permission from the appropriate Vice President or General Services Manager;
 - 2. Event Sponsors, at least ten days prior to the event, must obtain and send a copy of the caterer’s insurance certificate and liquor license to Aladdin in order for them to review and potentially approve the outside Caterer.
 - (a) If approved, Aladdin will send approval with a copy of the alcohol serving policies to both the Event Sponsor and Caterer. Both the Event Sponsor and the Caterer must comply with all provisions of this policy.
 - (b) If the Caterer is not approved, Event Sponsors must either use Aladdin or not serve alcohol at their event.
- C. Event Sponsors will be held accountable if failing to comply with these policies and may be denied permission to serve alcohol at future events.
- D. Aladdin bartenders/servers must be 21 years of age and be knowledgeable about the drinks being mixed and/or served. Aladdin supervisors and bartenders/servers will successfully complete TIPS training prior to working a Fontbonne event.
- E. Alcoholic beverages will only be served by the individual glass, bottle, or can. No kegs or pitchers of beer will be served. Aladdin will determine and monitor the number of drinks served to individuals and has the right to deny service to anyone.
- F. Depending upon the nature of the event, Aladdin bartenders/servers may require proof of age from individuals requesting an alcoholic beverage. Aladdin may also decide it is necessary to use some form of visible identification process (e.g. stamps, wristbands, etc.) with individuals who are 21 years or older. Event Sponsors may be required to assist with this process and provide the necessary supplies.
- G. Event Sponsors must not take unused and/or unopened alcohol from an event. Aladdin will be responsible for the disposal of unused and/or unopened alcohol from an event. If Aladdin is unavailable to remove the unused or unopened alcohol at the end of an event, the Event Sponsors are responsible for collecting and retaining it until it can be retrieved by Aladdin.
- H. If alcohol is donated to Fontbonne for an event, it must be given to Aladdin. Aladdin will then serve the alcohol at no charge for the beverage. Aladdin will not serve alcohol from donated kegs or any other large containers.
- I. Alcohol advertising (e.g., “B.Y.O.B”) for any on or off-campus event is not permitted.

- J. All events must have a specified beginning and end time. Serving of alcoholic beverages will cease one-half hour prior to the end of the event. Sufficient and appropriate food must be served at events that have alcohol available.
- K. Student organizations requesting to serve alcohol at an event must request approval from the Assistant Vice President for Student Affairs and, if approval is given, may include additional procedures to follow.
- L. Event Sponsors are responsible for:
1. Notifying Public Safety for events where the attendance is anticipated at 100+ participants. Public Safety should be contacted a minimum of 10 business days prior to the event. Public Safety may request that a Public Safety officer or off-duty police officer be hired for the duration of the event. Additional fees will apply at the expense of the Event Sponsor.
 2. Introducing themselves and other Event Sponsors to the bartenders/servers and Public Safety or Off-Duty Officers, if present, at the beginning of the event.
 3. Monitoring that individuals do not bring alcohol into an event or take alcohol away from an event.
 4. Creating signage stating individuals cannot bring alcohol into an event or take alcohol away from an event (Signage should be removed by the Event Sponsors once the program is over).
- M. Generally, if the event is hosted in the Dunham Student Activity Center Alumni Cafe, alcohol may only be served if the snack bar is closed.
- N. Aladdin bartenders/servers are responsible for reporting any disruptions in the serving area to Event Sponsors and Public Safety.

2.2.5 Tobacco Use Policy

Fontbonne University is a tobacco-free campus. Smoking or other use of tobacco products or smoking related products, including the use of smokeless, e-cigarettes or other devices that simulate visual, sensory and behavioral aspects of smoking, is prohibited on all University property, including all buildings, outdoor spaces and in University-owned vehicles. Such items include, and are not limited to, cigarettes, electronic cigarettes, cigars and cigarillos, hookah smoked products, pipes and oral tobacco. Future reference to tobacco use or smoking includes the above referenced items, such as e-cigarettes. Tobacco use is permitted on the sidewalks along Big Bend and Wydown Boulevards and in personal vehicles that are parked on campus. This policy applies to the Clayton campus.

Off-site campus locations shall continue to prohibit all tobacco use within buildings and shall also comply with any local municipality or county restrictions. No smoking will be permitted within 15 feet of the entrance of any branch location.

Voluntary compliance with the tobacco-free campus policy will be emphasized. Anyone who observes that the policy is being violated is encouraged to bring it to the attention of the smoker. Individuals found smoking by Public Safety will be asked for identification and will be given a reminder notice about the University's policy. In the event that any individual is found to regularly violate the University's tobacco-free policy, for employees, the issue will be referred by Public Safety to the employee's supervisor or department head, or for students, to the Office of Student Affairs for appropriate action. Violations of this policy will be subject to the rules and sanctions contained in the University Policy Manuals and in the Code of Student Character and Conduct. In the event that a violator is unwilling to show identification upon request to a public safety officer, the Clayton Police will be called to respond to trespassing.

2.2.6 Drug Free Workplace

The unlawful use of a controlled substance in any setting is dangerous. Employees of Fontbonne University, including students in work study positions, who unlawfully use a controlled substance in the workplace not only jeopardize their own employment and safety, they also place other employees, our students, and guests of the University at personal risk. All employees of the University serve as role models for students. And, the unlawful use of a controlled substance in the workplace would not only violate laws, but is contrary to the spirit and mission of Fontbonne University.

Fontbonne abides by the provisions of the Higher Education Amendment of 1998 and all employees and students, including those making application for Federal Pell Grants, are required to sign a statement of compliance.

2.2.7 Student Drug Testing Policy

Fontbonne University promotes a safe, drug-free living and learning environment. As stated above, Fontbonne University prohibits the use, possession, manufacture or distribution of illegal drugs or other controlled substances as well as the use or possession of drug paraphernalia.

Fontbonne University believes that drug testing based on a reasonable suspicion of drug use is appropriate to ensure the health, safety and welfare of its students and to assist students before they may harm themselves or others. Accordingly, Fontbonne University may require a student to submit to a drug test if a student has acknowledged substantial drug use or when there is reasonable suspicion that a student is under the influence of illegal drugs or controlled substances. Reasonable suspicion is based on the student's appearance, behavior or conduct that indicates the student may be under the influence of an illegal drug or controlled substance. When an incident occurs, the Student Affairs Office should immediately be notified to review the facts and circumstances in order to determine if reasonable suspicion exists and the appropriate course of action.

Fontbonne University will engage the services of a qualified laboratory to conduct the drug test. A positive test result for unlawful drugs (or lawful drugs not used in connection with and in conformity with a physician's prescription) or an adulterated or diluted sample as reported by the testing laboratory, may result in the student not being permitted to live on campus, suspension, dismissal or other action that Fontbonne University, in its sole discretion, deems appropriate depending on the circumstances. If a student refuses to take a drug test, such refusal will be treated the same as a positive test result.

Fontbonne University recognizes that substance abuse is an illness and a health problem. Fontbonne University is willing to help students obtain assistance needed in the resolution of a substance abuse problem.

Fontbonne University will make good faith efforts to maintain the confidentiality of all drug test results. Test results may be disclosed to the student, the student's parents or guardians, and to those who have a legitimate need to know, as determined by Fontbonne University, in its sole discretion.

2.2.7.1 LEGAL SANCTIONS

2.2.7.1.1 Drugs

The manufacture, possession, sale, distribution, and use of illicit drugs is prohibited by city and county ordinance, state law, and federal statute. Punishments range from fines of \$50 to life imprisonment. The statutes and ordinances define the drugs deemed "illicit."

2.2.7.1.1.1 Drug Trafficking Penalties

<u>DRUG SCHEDULE WITH EXAMPLES</u>	<u>MINIMUM FEDERAL SANCTION FOR OFFENSE BY INDIVIDUAL</u>	<u>MISSOURI SANCTIONS</u>
Schedule I – Mescaline, LSD, Heroin, Peyote	5 – 40 years or life in prison - \$2 to \$4 million fine	5 – 30 years or life in prison
Schedule II - Methamphetamine, Cocaine, Opium, PCP	5 - 40 years or life in prison; \$2 - \$8 million fine	5 – 30 years in prison
Schedule III Drugs	10 years in prison; \$150,000 - \$500,000 fine	5 – 15 years in prison
Schedule IV Drugs – Flunitrazepam	3 – 6 years; \$200,000 - \$500,000 fine	5 – 10 years in prison
Schedule V Drugs	1 – 2 years; \$100,000 - \$200,000 fine	5 – 10 years in prison
Marijuana	5 – 40 years or life in prison; \$250,000 - \$8 million fine	Up to 7 years, up to \$5,000 fine (5 gms. or less); 5 – 15 years (more than 5 gms.)

2.2.7.1.2 Alcohol

Missouri's Liquor Control Law makes it illegal for a person under the age of twenty-one years to purchase or possess any intoxicating liquor. R.S.Mo. §311.325(1). Violation of this provision can subject one to a fine of up to \$1,000 and/or imprisonment for a maximum term of one (1) year. County and municipality ordinances contain similar prohibitions and sanctions.

2.2.7.2 HEALTH RISKS

2.2.7.2.1 Drugs

Physical and psychological effects of both short and long term drug use vary with the type and amount of drug used. Marijuana use can lead to heartbeat acceleration, impairment in mental perception, memory loss, impulsive behavior, anxiety attacks, respiratory problems, infertility, and lung disease. Cocaine use can lead to high blood pressure, sweating, vomiting, irritation and inflammation of nasal tissue, loss of appetite, delusions, altered perceptions, and death from respiratory failure.

Use of hallucinogens can lead to dizziness, increase in heart rate, nausea, perceptual changes, delusions, hallucinations, and flashbacks. Use of stimulants can lead to diarrhea, heart palpitations, increased blood pressure, kidney failure, weight loss, irritability, and hallucinations. Use of depressants can lead to slurred speech, staggering gait, altered perception, slowing down of reflexes and reaction time, increased anxiety and depression, and death from lack of oxygen.

Use of drugs during pregnancy may lead to premature births and/or mental or physical handicaps in the infant. Use may also cause infant to acquire a drug dependency at birth

2.2.7.2.2 Alcohol

Abuse of alcohol can produce severe health risks, including death. Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair judgment and coordination required to drive a car safely, increasing the likelihood that the driver will be involved in an accident.

Low to moderate doses of alcohol also increase the incidence of a variety of aggressive acts, including spouse and child abuse. Moderate to high doses of alcohol cause marked impairments in higher mental functions, severely altering a person's ability to learn and remember information. Very high doses cause respiratory depression and death. If combined with other depressants of the central nervous system, even lower doses of alcohol will produce the effects just described.

Repeated use of alcohol can lead to dependence. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations, and convulsions. Alcohol withdrawal can be life threatening. Long-term consumption of large quantities of alcohol, particularly when combined with poor nutrition, can also lead to permanent damage to vital organs such as the brain and the liver.

Mothers who drink alcohol during pregnancy may give birth to infants with fetal alcohol syndrome. These infants have irreversible physical abnormalities and mental retardation. In addition, research indicates that children of alcoholic parents are at greater risk than others of becoming alcoholics.

2.2.7.3 DRUG OR ALCOHOL COUNSELING, TREATMENT OR REHABILITATION

The Student Affairs Office in Medaille Hall provides the following resources for students:

1. literature about alcohol and other drugs
2. professional counseling and off-campus referrals
3. registration for a designation health and counseling service
4. educational programs for students who violate University alcohol and drug policies

The provisions of health insurance for Fontbonne employees cover, with limitations, treatment for alcohol and drug dependency.

The provisions of the Employee Assistance Program include counseling for substance abuse.

2.2.7.4 DISCIPLINARY SANCTIONS

Different disciplinary procedures are applicable to faculty, staff, and students. Violations of the standards of conduct will be addressed on a case by case basis with the imposition of discipline being appropriate to the severity of the violation. For each group comprising the University community, there are certain common sanctions that may be applied. These include letters of reprimand, probation, and severance of ties with the University through expulsion or termination. Opportunity for referral to an appropriate rehabilitation or counseling program may be associated with a first offense. Referral for prosecution will usually occur only for the most serious violations.

1. Faculty: Faculty discipline is administered according to the process outlined in the Faculty Handbook.
2. Staff: The University staff is subject to disciplinary procedures that are outlined in the Employee Handbook.
3. Students: The alcohol and drug-related guidelines for student conduct are contained in the Student Handbook. Sanctions for students generally will follow from the severity of the infraction and can include probation, residence hall dismissal, required participation in counseling or educational programs, and expulsion. The University may notify the parents of dependent-aged students for alcohol and drug-related infractions.

2.2.8 Medical Record Keeping

Any medical records relating to a Fontbonne University employee shall be kept in a separate file in the Human Resources Office.

2.2.9 COVID-19 Pandemic Response

Fontbonne University has established policies and guidelines in response to a COVID-19 Pandemic situation. These policies and procedures are contained in the document “Griffin Return” and its accompanying web pages located on the Fontbonne University website at <https://www.fontbonne.edu/griffin-return/>. The accompanying web pages also contain links to additional policies and procedures created in response to the COVID-19 pandemic. All students and employees will sign a document entitled “Fontbonne University Community Agreement and Dear Neighbor Pledge” and “Dear Neighbor Pledge,” respectively, which lists behaviors and guidance that protect the health and wellbeing of members of the Fontbonne community during a pandemic. All such COVID-19 related policies, procedures, guidelines and pledges have been approved by the Executive Leadership Team (“ELT”) as appropriate and necessary during such a public health crisis and are mandatory for Fontbonne University community members.

As this is an ever-evolving situation, updates to these documents and web pages will be authorized and communicated to the affected parties as deemed necessary and appropriate. Continued monitoring of updates through university email and our home website is encouraged. These policies supersede any current policies or procedures that stand in conflict with these COVID-19 policies and that would normally be in effect if it were not for the COVID-19 pandemic situation. The ELT will determine when these public health policies and procedures will be rescinded and will announce this to the community at the appropriate time.

2.3 SAFETY POLICIES

2.3.1 Firearms and Weapons

In order to ensure a safe environment for employees, students, and visitors, the possession, transport, storage, use, or sale of weapons or hazardous materials, including firearms, is prohibited on the property of the University, at work sites and University functions, or at any time for students and for employees during the course and scope of performing their job duties on behalf of the University. Weapons include, but are not limited to, firearms, knives, swords, arrows, air pellet guns, paint ball guns, or any item resembling any of these items.

Specifically, the University prohibits all persons who enter its property from carrying a handgun, firearm, or other weapon of any kind onto its property, regardless of whether the person is licensed to carry the weapon or not. The policy covers all property owned by or operated by the University, including buildings and surrounding areas such as sidewalks, walkways, driveways, and parking areas under University ownership or control. Vehicles of the University are covered by this policy at all times regardless of whether they are on University property at the time or not. This policy also applies to personal vehicles when they are being used for University business.

This policy applies to all employees, students, and visitors, or any other individuals on University property or at University functions. Employees are prohibited from carrying a weapon while on University property or while performing any task on behalf of the University, whether they are on workplace property at the time or not, regardless of whether they are licensed to carry a concealed weapon at other times or places.

The University reserves the right to conduct searches of any person or vehicle that enters University property. This provision includes searches of clothing, lockers, purses, bags, backpacks or briefcases, and vehicles on the property.

Anyone violating this policy will be subject to disciplinary action up to and including immediate termination or dismissal.

2.3.2 Public Safety

Uniformed officers patrol the campus 24 hours a day. You may contact a public safety officer from an on campus telephone by dialing extension: HELP (4357) or 4596

From an outside telephone, dial: 314-719- HELP (4357) or 314-889-4596

If the officer is on the telephone when you call, you will receive a voice mail message. You may leave a message and the officer on duty will return your call. If you wish, you may page the officer on duty by calling (314) 381-HELP (4357). At the tone, you will need to dial in your call back number. The security officer on duty will return your call when the page is received.

Please report any unsafe conditions, situations, and/or suspicious people on campus to:

- Public Safety by dialing 314-719- HELP (4357) extension (4357)
- Director of Public Safety by dialing 314-719-8024 (extension 8024)
- Student Affairs by dialing extension 314-889-1411 (extension 1411)

2.3.3 Security Policies

The campus is located within the jurisdiction of the City of Clayton Police Department. In emergencies, you may contact Public Safety by dialing (719-) 4359 (HELP) or the Clayton Police Department or Fire Department by dialing 911.

1. Residence Halls: All residence hall buildings and/or stairwells should be locked at all times. Residents have keys or key cards to gain access to the building. Phones are provided on the outside of each residence hall for visitors to call the resident they wish to see. Residents must escort their visitors at all times once they enter the residence halls.

If suspicious persons are found in or around the residence halls, report them to a Resident Assistant (RA) or to the public safety officer on duty. Resident students are also advised to lock their room doors at all times and when they leave their rooms. Outside doors to the residence halls should never be propped open and residents are asked to close any open doors, as well.

2. Sexual assaults: The Office of Student Affairs offers information that promotes awareness about sexual assaults in the following forms: literature is available in the office in Medaille Hall, information programs are conducted in the residence halls, the policies about sexual harassment are published in the Griffin Scratch Student Handbook, and during orientation events for new students.

Students who are victims of sexual assaults are asked to notify the campus Public Safety Office or the Office of Student Affairs as soon as possible. Students are advised to seek immediate medical treatment at the nearest hospital.

Victims of sexual assaults are also encouraged to notify the Clayton Police Department. If desired, the Public Safety Office or staff in Student Affairs will provide assistance in notifying law enforcement authorities.

The University's Office of Counseling and Career Development is available for confidential short term counseling for students who are victims of a sexual assault. The Office will also make referrals for off campus counseling upon request of the victim or at the discretion of the professional staff.

The University will place a high priority in accommodating requests from victims of sexual assault for changes in their academic and living situation. While not all such requests can be honored, every effort will be made to provide a reasonable and prompt response to a victim's request. Options for changes in the residence hall may involve a change in the victim's room or building. Requests for academic changes, such

as switching to a different section of the same class, or moving a student to a different seat will be addressed in consultation with the instructor.

Victims who wish to bring disciplinary action against a student should report the incident to the Office of Student Affairs and must be willing to provide sufficient information for an investigation to proceed. Accusations of sexual assault will be processed according to the procedures for campus conduct and discipline described in Griffin Scratch Student Handbook.

Sanctions against students who are responsible for sexual assault may include, but are not limited to expulsion from Fontbonne, dismissal from the residence hall, and partial dismissal (i.e., from one or more classes).

3. The Jacob Wetterling Crimes against Children and Sexually Violent Offender Registration Act (42 U.S.C. §14071 (j)) requires that information concerning registered sexual offenders who may be attending or employed by an institution of higher education must be maintained. The Clayton Police Department ((314) 727-4130) maintains this information for Fontbonne University.

2.3.3.1 CRIME ON CAMPUS

2.3.3.1.1 Compiling Crime Statistics

Certain Fontbonne administrators and department offices have been designated to complete a Campus Crime Report form when an incident involving alleged criminal activity is reported to them. The completed Campus Crime Reports are forwarded to the Public Safety Office. The Public Safety Office uses these reports to compile campus crime statistics.

Fontbonne University administrators and offices that are in the position to receive and complete reports of criminal activity include:

1. Senior Administrators and their offices: This includes the Vice President for Finance and Administration, Vice President for Institutional Advancement, Vice President for Enrollment Management, Vice President for Academic Affairs, Vice President for Student Affairs, and the Vice President for Information Technology.
2. Public Safety officers and the Director of Public Safety.
3. Director of International Affairs.
4. Director of Service, Diversity, and Social Justice
5. Director of Athletics.
6. Associate Vice President for Student Affairs.
7. Faculty members teaching an off-campus course.
8. The offices of Campus Ministry and Counseling and Career Development may also receive reports of criminal activity. These offices are not required to report criminal activity encountered as a result of their professional services. Confidentiality of their offices is maintained. These offices do insure that victims and witnesses know the proper procedures for reporting crime.

The Campus Crime Report form is found in Appendix 2.3.3.1.1.

Fontbonne University encourages victims and witnesses to report all criminal activity. The University responds to all reported incidents and investigates each incident to the fullest extent possible. When appropriate, the Director of Public Safety coordinates investigations with other University officials and/or the Clayton Police Department.

2.3.3.1.2 Daily Crime and Incident Reports

The Public Safety Department prepares and maintains a brief report summarizing incidents and crimes that are reported to the department. Entries are posted to this log within two working days from the date a report is received. Entries to this log may be delayed if releasing information adversely affects an investigation or jeopardizes the safety of the people involved, or for other reasons. The log for the prior 60 days is displayed in Ryan Hall, Room 101. Anyone wishing to review entries older than 60 days should contact the Director of Public Safety at (314) 719-8024.

http://www.fontbonne.edu/studentlife/oncampus/publicsafety/crime_and_fire_reports/

2.3.3.1.3 Annual Crime Statistics

In accordance with the Clery Act, 20 U.S.C. § 1092(f), crime statistics for the following offenses must be compiled and disseminated annually:

1. Murder and Non-negligent Manslaughter: The willful (non-negligent) killing of one human being by another.
2. Manslaughter by Negligence: The killing of another person through gross negligence.
3. Robbery: The taking or attempting to take anything of value from the care, custody, or control of a person or persons by force or threat of force or violence and/or by putting the victim in fear.
4. Aggravated Assault: An unlawful attack by one person upon another for the purpose of inflicting severe or aggravated bodily injury. This type of assault usually is accompanied by the use of a weapon or by means likely to produce death or great bodily harm. (It is not necessary that injury result from an aggravated assault when a gun, knife, or other weapon is used which could and probably would result in serious personal injury if the crime were successfully completed).
5. Forcible Sex Offenses: Any sexual act directed at another person, forcibly and/or against that person's will; or not forcibly or against that person's will where the victim is incapable of giving consent because of his/her physical or mental incapacity.
6. Non-forcible Sex Offenses: Unlawful, non-forcible sexual intercourse.
7. Burglary: The unlawful entry of a structure to commit a felony or theft. For reporting purposes this definition includes: unlawful entry with intent to commit a larceny or felony; breaking and entering with intent to commit a larceny; housebreaking; safecracking; and all attempts to commit any of the aforementioned.
8. Arson: Any willful or malicious burning or attempt to burn, with or without intent to defraud, a dwelling house, public building, motor vehicle or aircraft, personal property of another, etc.
9. Motor Vehicle Theft: The theft or attempted theft of a motor vehicle. (Classify as motor vehicle theft all cases where automobiles are taken by persons not having lawful access even though the vehicles are later abandoned – include joyriding.)
10. Liquor Law Violations: The violation of laws or ordinances prohibiting the manufacture, sale, transporting, furnishing, possessing of intoxicating liquor; maintaining unlawful drinking places; bootlegging; operating a still; furnishing liquor to a minor or intemperate person; using a vehicle for illegal transportation of liquor; drinking on a train or public conveyance; and all attempts to commit any of the aforementioned. (Drunkenness and driving under the influence are not included in this definition.)
11. Drug Abuse Violations: Violations of state and local laws relating to the unlawful possession, sale, use, growing, manufacturing, and marking of narcotic drugs. The relevant substances include: opium or cocaine and their derivatives (morphine, heroin, codeine); marijuana; synthetic narcotics (Demerol, methadones); and dangerous non-narcotic drugs (barbiturates, benzedrine).

12. Weapons Law Violation: Violations of law or ordinances dealing with weapon offenses, regulatory in nature, such as: manufacture, sale or possession of deadly weapons; carrying deadly weapons, concealed or openly; furnishing deadly weapons to minors; aliens possessing deadly weapons; and all attempts to commit any of the aforementioned.
13. Violations of Fontbonne University's Alcohol policy.
14. Violations of Fontbonne University's Drug policy.
15. Violations of Fontbonne University's Weapons Possession policy.

Of these crimes and other crimes in which the victim is intentionally selected because of the actual or perceived race, gender, religion, sexual orientation, ethnicity, or disability of the victim, this data shall be collected and reported according to category of prejudice.

2.3.3.1.4 Reported Criminal Offenses

The number of these reported criminal offenses has been summarized and is available for review on Fontbonne University's website Most Recent Crime Report at <https://www.fontbonne.edu/student-life/student-services/public-safety/crime-fire-reports/>.

2.3.4 Emergency Response Policies & Manual

2.3.4.1 INTRODUCTION

Fontbonne's emergency response manual outlines activities to enhance the protection of lives and property through the effective use of our resources. Activities included in this document are responses to emergencies that cannot be handled by routine measures and preventive measures to help reduce exposure to unsafe conditions.

This manual was developed specifically for the use by Fontbonne administrators in response to emergencies. It should be used as a guideline in training faculty, staff, and students to respond properly during an emergency.

It should be noted that the guidelines describing the response to emergency situations are general in nature. This is to allow flexibility in dealing with the unpredictable and unique circumstances surrounding each emergency. While this manual does not cover every conceivable situation, it does supply the basic administrative guidelines necessary to cope with any emergency occurring at Fontbonne.

Section 2.3.4.2 is a summary of emergency response procedures. The complete Emergency Response Manual is also available on the Public Safety Website. <https://www.fontbonne.edu/campus-life/public-safety/emergency-procedures/>

2.3.4.1.1 Authorization and Procedural Changes

This manual has been authorized and approved by the President's Cabinet for Fontbonne University. The Public Safety Department has the responsibility of maintaining this manual. All requests for procedural changes, suggestions or recommendations should be submitted in writing to the Public Safety Department for review. All changes to this manual will be approved by the President's Cabinet.

2.3.4.1.2 Scope

These procedures apply to all people who frequent property owned or operated by Fontbonne University. This includes faculty, staff, student, and visitors. For the purposes of this manual, contract employees permanently assigned to Fontbonne University will be held to the same expectations as Fontbonne University employees in regards to preparing and training their employees in accordance to this manual.

2.3.4.1.3 Responsibilities

It is the responsibility of all vice presidents to:

- Ensure each department under their supervision is furnished a copy of this manual. Additional copies may be downloaded from the Public Safety section of the Fontbonne web site.
- Ensure changes in this manual are disseminated to those holding copies of this manual. Vice presidents will have changes submitted to them.
- Issue an annual statement to their departments reminding supervisors, directors, and faculty members of their responsibility as outlined in the Emergency Response Manual.

Each director, supervisor, and faculty member should read and be familiar with the contents of this manual. All directors and supervisors are responsible for people under their supervision. Faculty members are responsible for the students in their classes. Responsibilities of directors, supervisors, and faculty members in regard to this manual are outlined below:

During Normal Conditions

- Ensure their faculty/staff/students are aware of the appropriate response to emergencies as well as the evacuation procedures for their specific building and/or work area. The guidelines in Addendum A may be reproduced, circulated, and used as training aid in fulfilling this responsibility. See section 4.2 for further details regarding training.
- All unsafe practices and conditions observed should be stopped or reported to either the Physical Plant Office at extension 4564 or the Public Safety Office at extension 4357 (HELP).
- All suspicious activities and illegal acts you observe should be reported immediately to the Public Safety Office at extension (719-) 4357 (help).

During Emergency Conditions

- Report all emergencies to either the Public Safety Office (extension 4596) or the Fontbonne operator (dial 0). If no one can be reached, dial 911.
- If evacuation is necessary, activate the building alarm and/or alert others of the emergency.
- Help move people to safety.
- Request emergency assistance.
- Assist emergency response personnel if assistance is requested.
- Fulfill recovery responsibilities as detailed in section 3 of the manual.

2.3.4.1.4 Public Relations

Fontbonne University has basic guidelines to observe during a crisis situation in regard to releasing information:

1. Only authorized persons from the Communications & Marketing Department will release information to or talk with the media or other persons concerning emergencies involving Fontbonne University. Authorization to release information or make statements will be channeled through the crisis team.
2. Only factual information will be released. Information will be openly and honestly released. The media will be given as much information as possible, both the good and bad news.
3. The campus community will be kept informed through one-on-one meetings and voice mail.

All requests for information concerning campus emergencies will be directed to the Communications & Marketing Office at extensions 314-889-1402, 314-889-1483, or 314-889-1467.

Timely reports will be made to Communications & Marketing in order to keep them informed with up-to-date information.

Communications & Marketing will notify the switchboard operator when an emergency occurs. Instructions will be given concerning the appropriate response to questions. A voice or email message will be distributed to the campus community with the same information.

If individuals from the media appear on campus, the Communications & Marketing Office should be notified immediately. An area away from the emergency will be established for the media where a member from the Communications & Marketing Department will release information regarding the situation. Members of the media are restricted to this area. Only authorized people from the Communications & Marketing Department will release information or talk to the media.

2.3.4.2 EMERGENCY RESPONSE

2.3.4.2.1 Reporting an Emergency

All emergencies should be reported to the Public Safety Office by dialing extension:

4357 (HELP) or 0

(719-4357)

(Fontbonne University operator, 8 a.m. – 4:30 p.m., Monday through Friday).

Should you need the police, fire department, or an ambulance and no one listed above can be reached,

Dial: **911** (9-911)

When you call to report an emergency, stay calm and speak slowly. Give the following information:

- State, “This is an emergency call.”
- Describe the exact location.
- Carefully explain the problem.
- Identify yourself and your phone number.
- **DO NOT HANG UP UNTIL YOU ARE TOLD TO DO SO.**
- You may be asked to stay by the phone or be given other instructions.

If anyone is available, dispatch one individual to a location near the emergency to meet and escort responding personnel to the site of the emergency. Ask witnesses to remain at the emergency site and help keep non-participants away. Emergency personnel will take control of the situation when they arrive. Neither you nor the witnesses should leave until you have been told that you are no longer needed.

2.3.4.2.2 Building Evacuation

The guidelines below should be followed when evacuating any building:

1. All building evacuations will occur when an alarm sounds and/or upon verbal instructions. Building fire alarms are activated by the directions listed on the pull stations. Pull stations are located by the fire stairwell doors on every floor of every building. If a building alarm system is inoperable, individuals will need to be verbally alerted. In the event of a gas leak, do not activate the building alarm system. Alert people verbally to evacuate the building.

2. Leave by the nearest marked exit and alert others to do the same. Do not enter any area marked by a hazardous material warning sign. If time permits, secure or take your personal purse, wallet, etc. with you.
3. Assist people with disabilities in exiting the building. Remember that elevators are reserved for people with disabilities. **DO NOT USE THE ELEVATORS IF THE BUILDING IS BEING EVACUATED DUE TO FIRE.**
4. Once outside, proceed to a clear area that is at least 500 feet away from the affected area. Keep streets, fire lanes, hydrant areas and walkways clear for emergency personnel. Faculty members should account for their students by conducting a head count.
5. Do not return to an evacuated building unless you are told to do so by a Fontbonne official.
6. During periods of inclement weather, you will be directed to go to another building.

2.3.4.2.3 Tornadoes

You should know and understand the following terms:

- **TORNADO WATCH:** A tornado watch is issued by the National Weather Service when conditions are favorable for a tornado to occur. You should be prepared to take immediate action if a tornado warning is issued.
- **TORNADO WARNING:** A tornado warning is issued by the National Weather Service when a tornado has been sighted and moving towards your area. You should take immediate action if the tornado warning sirens sound.
- **TORNADO DRILL:** A tornado drill is an exercise for practicing our response for a tornado warning.

Individuals on University property will move to emergency reporting areas for tornadoes when the St. Louis County emergency sirens sound. You will stay in the reporting areas until the all clear has been issued by the National Weather Service. Public Safety will monitor the Weather Service broadcasts and announce the all clear on a voice message. The message may be heard by calling extension **8091**. If the weather sirens sound again after the all clear has been given, individuals will move back to the emergency reporting areas until a new all clear announcement is released.

The procedures below will be followed when the tornado sirens sound:

1. You should move to the tornado emergency reporting area for your building. See table 2.1. You should sit with your head against the wall with your head down if the storm strikes. Faculty members should account for their students by taking a head count.
2. As you leave your office or room, close all windows and doors. If time permits, secure or take your personal purse, wallet, etc. with you.
3. All people should remain in the emergency reporting areas until the all clear has been given.
4. All damage and injuries resulting from the storm should be reported to the Department of Public Safety by dialing extension 4596 or 0. Public Safety will call for emergency assistance and make the proper notifications.

If damage from the storm creates an emergency which requires evacuation of the building:

1. Activate the building alarm and walk to the nearest marked exit. Alert others to do the same. Do not enter any area marked by a hazardous material warning sign.
2. Assist people with disabilities in exiting the building. Remember that elevators are reserved for people with disabilities. **DO NOT USE THE ELEVATORS IF THE BUILDING IS BEING EVACUATED DUE TO FIRE.**

3. Once outside, proceed to a clear area that is at least 500 feet away from the affected area. Keep streets, fire lanes, hydrant areas and walkways clear for emergency personnel. Faculty members should account for their students by conducting a head count.
4. Do not return to an evacuated building unless you are told to do so by a Fontbonne official.

Table 2.1 Tornado Reporting Areas

Dunham Student Activity Center	Training room, northwest stairwell, walkway to weight room
East Building	1 st floor hallways, away from windows
Fine Arts Building	1 st floor restrooms and lower level hallways
Library	Basement
Medaille Hall	Basement, Mezzanine Lounge and bathrooms between suites
Physical Plant	Tunnel and basement
Ryan Hall	1 st floor hallway near room 105, hallway near book store, away from windows
Anheuser-Busch Hall	1 st floor hallway away from windows, men's bathroom on 1 st floor and 1 st floor stairwells
St. Joseph's Hall	Hallway between lounges

2.3.4.2.4 Fires

All emergencies should be reported to the Public Safety Office by dialing extension:

4357 (HELP) or 0
(719-4357) (Fontbonne University operator, 8 a.m. – 4:30 p.m., Monday through Friday).

Should you need the police, fire department, or an ambulance and no one listed above can be reached,

Dial: **911** (9-911)

Do not attempt to extinguish a fire unless:

- You first report the fire to the Public Safety Department.
- You have been trained and know how to properly use a fire extinguisher.
- You can safely extinguish the fire with the type and size of fire extinguisher on hand.

DO NOT ATTEMPT TO PUT THE FIRE OUT IF THERE IS ANY DOUBT IN YOUR MIND AS TO WHETHER YOU CAN SAFELY DO IT.

The procedure below should be followed in case of fire:

1. Activate the building fire alarm and/or alert people verbally. All people should exit by the nearest marked exit. Do not enter any area marked by a hazardous material warning sign. Close all room doors as you exit. **DO NOT LOCK DOORS IF SMOKE OR THE SMELL OF SMOKE IS PRESENT.** If time permits, secure or take your personal purse, wallet, etc. with you.
2. Assist people with disabilities in exiting the building. Do not use the elevators. Smoke is the greatest danger in a fire. If it is necessary, stay near the floor where the air is less toxic.

3. Once outside, move to a clear area that is at least 500 feet away from the affected area. Keep streets, fire lanes, hydrant areas and walkways clear for emergency personnel. Faculty members should account for their students by conducting a head count.
4. Dispatch one individual to a location near the emergency to meet and lead emergency responders to the site of the emergency.
5. Do not return to an evacuated building unless you are told to do so by a Fontbonne official.

NOTE: If you become trapped in a room or building during a fire and a window is available, place an article of clothing (shirt, coat, etc.) outside the window as a marker for emergency rescue crews. If a window is not present, stay near the floor where the air is less toxic. If you are in a room, place a wet towel or jacket at the base of the door. Shout at regular intervals to alert emergency crews of your location.

2.3.4.2.5 Earthquakes

During an earthquake, remain calm and quickly follow the steps below:

1. **IF INDOORS:** Take cover under heavy furniture, in interior doorways, or against an interior wall. Stay away from windows, glass and exterior doorways. Avoid bookcases, cabinets or other structures that may fall. Do not attempt to leave the building.
2. **IF OUTDOORS:** Move quickly to an open area away from buildings, trees, utility poles and electrical lines. Do not attempt to enter a structure or building.
3. **IF IN A VEHICLE:** Stop as quickly as safety permits away from buildings, trees, utility poles and overhead lines. Stay in the vehicle for the protection it provides.
4. After the initial shock, evaluate the situation. If the facilities are damaged or medical help is needed, contact the Public Safety Office giving them all relevant information. Protect yourself at all times and prepare for aftershocks.
5. If an emergency exists which requires emergency evacuation, activate the building alarm and walk to the nearest marked exit. Alert others verbally to do the same. Do not enter any area marked by a hazardous material warning sign.
6. Assist people with disabilities in exiting the building. Remember that elevators are reserved for people with disabilities. **DO NOT USE THE ELEVATORS IF THE BUILDING IS BEING EVACUATED DUE TO FIRE.**
7. Once outside, move to a clear area that is at least 500 feet away from the affected area. Keep streets, fire lanes, hydrant areas and walkways clear for emergency personnel. Faculty members should account for their students by conducting a head count.
8. Do not return to an evacuated building unless you are told to do so by a Fontbonne official.

2.3.4.2.6 Armed Intruders

If you observe an armed individual on campus, you should report the situation immediately to Public Safety by dialing extension:

4357 (HELP) or 0
 (719-4357) (Fontbonne University operator, 8 a.m. – 4:30 p.m., Monday through Friday).

Should you need the police, fire department, or an ambulance and no one listed above can be reached,

Dial: **911** (9-911)

Public Safety will insure 911 is called and keep people away from the affected area until the police arrive.

If you are in the affected area, you should alert others in the immediate vicinity and:

Response to Intruder Shooting at Your Building

Turn out the room lights, and lay on the floor. Consider crawling to a hallway away from the intruder.

Response to Armed Intruder in Your Building

Turn out the room lights, shut and lock the room door and move to a point in the room where you cannot be seen from the hallway.

Response to Armed Intruder If You Are Outdoors

Run to the closest structure that will shield you from the sight of the intruder. If nothing is close, run perpendicular from the intruder until you reach safety.

Unless you are in immediate danger, all people in the affected area should remain in place until instructions are received from emergency responders.

2.3.4.2.7 Loss of Utilities

During normal working hours, utility failures should be reported to the Physical Plant Office at extension (889-) 1404 or (889-) 4564. After normal working hours, utility failures should be reported to the Public Safety Office at extension (719-) 4358 (HELP). In the event there is an electrical failure that affects Ryan Hall, the campus telephone system may be inoperable and notification should be made in person.

If an emergency exists which requires evacuation of a building, follow the guidelines in section 2.2 of this manual, Building Evacuation.

Special consideration is needed for a gas leak. If a gas leak is detected, cease all activity and begin building evacuation. Do not switch on or off lights or other electrical equipment and do not activate the building alarm system. Verbally alert people to evacuate. The operation of any electrical items may cause arcing and can trigger an explosion.

2.3.4.2.8 Medical Emergencies

All medical emergencies should be reported to the Public Safety Office by dialing extension:

4357 (HELP) or 0

(719-4357) (Fontbonne University operator, 8 a.m. – 4:30 p.m., Monday through Friday).

Should you need the police, fire department, or an ambulance and no one listed above can be reached,

Dial: **911** (9-911)

Emergency Medical Situations

Emergency medical situations include:

- Unconsciousness
- Convulsions
- Inability to breathe or breathing with severe difficulty
- Severe chest pain
- Severe bleeding

- Possible fractures of the spine or major bones

For these situations, you should:

1. Report the situation stating, “This is a medical emergency.” Give the exact location of the victim, your name and describe the nature and severity of the medical problem. Do not hang up until you are told to do so. This procedure applies to all serious injuries and illnesses occurring on campus including those in the athletic areas, work areas, classrooms, residence halls, etc.
2. If available, send someone to a location near the emergency to meet and lead emergency responders to the scene.
3. Do not move the victim unless there is imminent threat of further injury.
4. After calling for help, administer first aid. Never provide or attempt to provide first aid beyond the scope of your training. No medication of any type may be given.
5. Ask all witnesses to remain until emergency responders arrive. Do not leave until you are told to do so.
6. Assist emergency responders on request.

If you are aware of an individual on campus that is seriously sick, injured, or appears to be having an unknown problem, you should report the situation to Public Safety by dialing (719-) 4357 (HELP). A Public Safety officer will respond to evaluate the situation.

NOTE: An ambulance will be called at the request of the victim regardless of the extent of the injuries or illness.

Non-Emergency Medical Situations

Non-emergency medical situations include:

- Minor illnesses like colds, sore throat, flu, fever, etc.
- Minor injuries such as sprains, bruises, cuts, scratches, etc.
- Health related concerns.

If a person has a non-emergency medical problem, the individual’s supervisor, faculty member, coach, or sponsor has the responsibility to ensure proper attention is received. Proper attention may include referring resident students to their R.A., helping to arrange transportation to the hospital, making a telephone call for the sick/injured individual, advising individuals to seek medical treatment from their personal physician, etc.

An ambulance will be called at the request of the victim even if the illness or injury is not considered to be an emergency.

Remember that no medication of any type will be given and you will not administer first aid beyond the scope of your training.

2.3.4.2.9 Catastrophic Emergencies

If an emergency occurs in our community where there is widespread injury to people or damage to property and immediate assistance from the police, fire department, and ambulance service is unavailable, everyone should:

- Evacuate damaged buildings and/or areas where danger exists
- Help with the evacuation of handicap and injured people
- Note location of trapped or unconscious people

- Administer first aid
- Follow the instructions given by University officials

Individuals on campus at the time of the emergency will be asked to register at the Information Center which will be located in the Interfaith Chapel in Medaille Hall. All hazardous conditions and the location of trapped, injured, or unconscious people should be reported at the time of registration. After registering, individuals should go to the Assembly Area in DSAC and wait for further instructions. If you have first aid training, you should go to the First Aid Station in DSAC. If needed, Fontbonne officials will seek volunteers from this Assembly Area to help with emergency efforts.

All students and visitors wishing to leave campus may do so after informing the Information Center of their decision.

All faculty and staff members are asked to remain on campus until the situation can be evaluated. All employees not needed for the emergency response will be released. All released employees choosing to leave Fontbonne should inform the Information Center of their decision to leave prior to departing campus.

Individuals choosing to leave campus should carefully evaluate the chances of reaching their destination before beginning their journey.

2.3.5 Pranks

Fontbonne University prohibits any type of prank, including but not limited to, signs, letters, communications concerning threats, or suspicious substances imitating anthrax or other chemicals. The University will not tolerate such actions.

2.3.6 Snow Schedule

Please refer to Policy Manual volume VII, section 7.3.4.15 for information on the snow schedule.

2.3.7 Drone Policy

For purposes of this policy, the term “Drone” means:

Any unmanned aircraft or unmanned vehicle, unmanned remote control and free-flight drones, helicopters, airplanes, mechanically propelled or propellant guided balloons, and rockets, of any size or weight, along with all of the associated support equipment, control station, data links, telemetry, communications and navigation equipment, etc., necessary to operate any of the foregoing objects.

The use of drones on or in University owned, rented, or leased property or buildings by individuals for recreational purposes is strictly prohibited.

The use of drones for non-recreational purposes, including research, teaching, business operations and third-party operations is also prohibited, but may be allowed on a case-by-case basis with the written consent of Fontbonne University via the President of the University or his/her designee.

2.4 INFORMATION TECHNOLOGY POLICIES

2.4.1 Information Technology and Electronic Communications Policy

All information technology systems and all electronic communications systems, and all information and communications transmitted by, received from, and stored in these systems, as well as any software, hardware, and business equipment, including but not limited to servers, computers, printers, copy machines, facsimile machines, telecopiers, telephone systems, E-mail systems, and Internet systems, are Fontbonne University property and are to be used for job-related purposes. All persons who use the University's information technology systems or electronic communications systems must follow the procedures described in this policy, and any other procedures required by the University.

2.4.1.1 PERSONAL USE OF UNIVERSITY EQUIPMENT & SYSTEMS

Employees may make limited personal use of the University's information technology systems or electronic communications systems only if it does not interfere with their work and does not adversely reflect upon the University. Any such use is subject to the sole discretion of the University.

Employees who make personal use of Fontbonne University's equipment or systems do so at their own risk and with the understanding that the University may access or monitor the use of such equipment at any time. The University's monitoring may include inspecting, retrieving, or downloading current, stored, or deleted material.

Employee's personal files (i.e. those not related to the conduct of university business) should not be stored on university-owned computers or network resources. The university will not retrieve any personal files for an employee (based on their request or of their designee) from any of its computer systems for any reason either during the period of employment or upon termination of employment. Likewise, employees should not destroy or remove any work product created during employment.

Improper use of the University's computers, telephone systems, E-mail systems, and Internet systems, including the creation or dissemination of offensive jokes or remarks, or pornographic material, will not be tolerated. An employee will be held liable for any non-work-related data or files which he or she creates, copies, or downloads in Fontbonne University's. Employees who violate this policy are subject to disciplinary action up to and including termination of employment.

2.4.1.2 INFORMATION TECHNOLOGY & ELECTRONIC COMMUNICATIONS PROCEDURES

1. All University information contained in University systems is to be used for its authorized purpose only. Unauthorized access, copying, or dissemination of University information is prohibited. Unauthorized persons are prohibited from accessing this information.
2. All access codes for University systems, including but not limited to files, computers, servers, E-mail systems, and Internet systems, are University property. No employee may use an access code that has not been issued to that employee or that is unknown to the University.
3. Unauthorized configuration or setup changes to any University equipment or systems are prohibited.
4. No hardware or equipment of any kind can be attached to or installed in University equipment or systems without prior authorization from the IT Department.
5. No data, files, software, or Email or Internet downloads are to be brought into University equipment or systems without prior authorization from the IT Department.
6. University anti-virus procedures must be followed when entering any data, files, software, or Email or Internet downloads into University equipment or systems.

2.4.1.3 EMERITUS FACULTY NETWORK ACCOUNT POLICY

Continued network account access granted to emeritus faculty is subject to the following restrictions:

1. Emeritus faculty must explicitly request to maintain a post-employment network account within 30 days of being accorded Emeritus status; otherwise accounts are deleted when employment ceases. This timeframe for making the request will be extended accordingly if Board of Trustees approval of Emeritus status is pending. Participation in the Fontbonne Community and Faculty message boards must be requested initially and then annually thereafter by June 1.
2. Accounts will be set to retain no more than 5000 messages or 1 GB of storage, whichever threshold triggers the system first. If you have opted in, message board emails count towards this limit.
3. The email account must be logged into at least once every 90 consecutive days through the Web Interface to keep the network account active. Inactive email accounts (and the messages they contain) will result in the network account being removed.
4. Individuals must be set up with the university's password reset system to minimize requests for Help Desk assistance in resetting passwords.
5. Emeritus accounts are subject to the university's Acceptable Use Policy and any other policies applicable to university network accounts.
6. In order to eliminate potential liability issues related to the retention of FERPA protected communications/data and proprietary university information by non-employees, accounts must be cleared of all email prior to moving the account to Emeritus status. An exception will be made for a limited amount of email necessary to maintain communication with professional contacts and associations. Contact lists may be retained. The Dean of the university college in which the Emeritus faculty serves will perform a review of the account within 60 days of it moving to emeritus status to ensure it complies with this provision.

2.4.1.4 COMMUNICATIONS PRIVACY

The University expects all users of electronic communications systems to respect the general privacy of any user. As set forth above, the University, including any supervisor, may access or monitor electronic communications systems.

2.4.1.5 GUIDELINES FOR COMMUNITY MESSAGE BOARD E-MAILS

Community Message Board informational e-mails may be sent by Fontbonne faculty and staff or by students who represent a registered student organization and have the approval of the Director of Student Activities and Leadership Programs. E-mails must clearly identify the topic in the subject line. All fund-raising announcements or requests must be approved by the Institutional Advancement Office.

While the Fontbonne community is open to and respects differing points of view, messages may not be sent which are not compatible with our institutional mission, values, and Catholic identity or which violate a campus policy.

In the event that the content of a message may be considered controversial, the sender should seek the advice of his/her divisional vice president.

2.4.1.6 SOCIAL MEDIA POLICY

When participating in social media or on social networking sites, employees should be respectful to Fontbonne, other employees, students, co-workers and competitors. Employees should be aware that actions captured via images, posts or other online comments can reflect that of Fontbonne. When participating in social media or on

social networking sites, do not reference faculty, staff or students without their express consent. Anyone posting inappropriate content on Fontbonne's social networking sites may be subject to discipline.

2.5 COPYRIGHT POLICY

2.5.1 What is Copyright?

Copyright law, as defined in Title 17 of the United States Code, protects "original works of authorship fixed in a tangible medium of expression" for a limited period. Copyright protection affords the creator the legal right to reproduce, distribute, publicly perform and publicly display their works. Copyright applies both to traditional media (books, records, etc.) and to digital media (electronic journals, web sites, etc.) and protects anything set in a fixed format, including, but not limited to, the following:

1. literary works
2. musical works
3. dramatic works
4. pantomimes and choreographic works
5. pictorial, graphic, and sculptural works
6. motion pictures and other audiovisual works
7. sound recordings
8. architectural works

Ownership of a copyrighted work includes the right to control the use of that work during the term of the copyright. Use of such work by others requires either permission from the author or reliance on an exemption to the law, such as the fair use provision. Failure to do one or the other will expose the user to a claim of copyright infringement for which the law provides remedies including payment of money damages to the copyright owner.

Copyright law does not protect ideas, data or facts.

2.5.2 What is the Duration of Copyright?

In the U.S., the general rule of copyright duration for a work created on or after January 1, 1978 is the author's life plus 70 years after the author's death. This is often referred to as "life-plus-70". Works created by companies or other types of organizations generally have a copyright term of 95 years. Copyright durations vary for works created before January 1, 1978. Once a work no longer carries copyright protection it passes into the Public Domain, meaning it is not protected by copyright law, and may be used freely, without the need to obtain the permission of the creator.

For assistance in determining whether an item is under copyright protection, use this chart:
<http://copyright.cornell.edu/resources/docs/copyrightterm.pdf> (last retrieved 4/28/16).

2.5.3 Exemptions to Copyright Law

Several options exist for those wanting to avoid the need to ask permission of a copyright owner:

1. Fair Use
2. The TEACH Act
3. Public Domain works
4. Creative Commons Licenses

2.5.3.1 FAIR USE EXEMPTION

An exemption to the copyright law is found in Section 107 of the Code. Under this “fair use” provision, a reproduction of a copyright-protected work is likely to be considered fair if it is used for criticism, comment, news reporting, teaching, scholarship or research AND take into consideration these four factors:

1. The purpose and character of use (principally, whether for commercial or nonprofit educational use);
2. The nature of the copyright-protected work;
3. The amount and substantiality of the portion used; and
4. The effect of the use upon the potential market for or value of the copyright-protected work.

Educational use, on its own, does not constitute a fair use. Courts have repeatedly ruled that a claim of Fair Use is based on a balancing of the four factors above. The law does not state exactly what constitutes a fair use. Claiming this exemption requires a very circumstance-specific analysis as to whether a particular use or reuse of a work may indeed be considered fair use.

Faculty should complete the “Checklist for Fair Use” in the Appendix to determine whether this exemption can legally be claimed. If an honest evaluation determines that it is not a Fair Use, explore the possibilities of using less of the work or using a different work altogether. If this is not possible, it is necessary to obtain permission from the copyright holder or its agent to use the work. Faculty should retain the completed Checklist for Fair Use in the course file to prove due diligence was undertaken in the event of a copyright claim.

See Appendix 2.5.3.1 for “Checklist for Fair Use”

2.5.3.2 THE TEACH ACT

The Technology, Education and Copyright Harmonization (TEACH) Act of 2002 addresses copyright issues related to distance education by accredited, non-profit educational institutions. Since the legislation did not define “distance education” TEACH applies to any online course whether the student is on or off campus.

Works that an instructor would normally show or play during class - a movie or music clip, images of artwork or a poetry reading - are covered. However, it does not cover materials to be used by students outside of class time - textbooks, supplemental readings, etc. The instructor must include a notice of copyright on all online courses, similar to the following: *“The materials on this course website are for the use of the students enrolled in this course for purposes associated with this course and may not be retained or further disseminated.”*

TEACH allows:

- Posting that would normally be used in a face-to-face class session, to a limited number of students in a specific course
- Performance of entire **non-dramatic** works (poetry or short story reading, standalone pieces of music such as a song or a concert piece, documentaries, interviews, etc.)
- Reasonable and limited portions of other works (films, videos, dramatic musical works)

TEACH does not allow:

- Transmission of textbook materials
- Transmission of materials “typically purchased or acquired by students”
- Transmission of works developed specifically for online uses
- Conversion of material from analog to digital when the digital version is protected by technological means or is unavailable
- Uses of unlawfully acquired copies
- Electronic reserves or electronic course packs

The TEACH Act does not replace Fair Use or digital license agreements but acts as a supplement. The instructor will need to determine which best serves the intended purpose of the material to be used. If the use is beyond Fair

Use, permission must be obtained. Digital or electronic content is subject to the same copyright restrictions as an analog work.

See Appendix 2.5.3.2 for TEACH Checklist which will clarify whether permission needs to be obtained to use specific material in an online course.

2.5.3.3 PUBLIC DOMAIN

A public domain work is a creative work that is not protected by copyright and which may be freely used by everyone. Works fall into the public domain for three main reasons:

1. the term of copyright for the work has expired
2. the author failed to satisfy statutory formalities to perfect the copyright
3. the author of the work is the U.S. Government

As a general rule, most works enter the public domain because of old age. This includes any work published in the United States before 1923. Another large block of works are in the public domain because they were published before 1964 and copyright was not renewed. (Renewal was a requirement for works published before 1978.)

The far right column of this chart shows what is in the public domain:

<http://copyright.cornell.edu/resources/docs/copyrightterm.pdf> (last retrieved 4/28/16).

2.5.3.4 CREATIVE COMMONS LICENSES

Creative Commons licenses work with the copyright law, allowing creators to modify the permissions needed to use their works. For example, using a Creative Commons License, a creator may allow reuse of their work without permission as long as they are given attribution and the work is not used in a commercial endeavor. This is only one example of the types of licenses available: <https://creativecommons.org/about/> (retrieved 4/29/16).

When looking for material to use in a course, Creative Commons materials are a good option.

2.5.4 Plagiarism

Plagiarism is the act of taking another's work and passing it off as one's own. To avoid plagiarism it is necessary to give proper credit to the author of the work being used. However, it is possible to properly credit the author and still be in violation of copyright law. These are two separate issues and both need to be addressed when using any work protected by copyright law.

2.5.5 Types of Use

2.5.5.1 CLASSROOM HANDOUTS

For materials under consideration in a face-to-face course that the instructor did not create, see Section 2.5.3 on Fair Use above. As suggested, complete the Checklist for Fair Use and obtain copyright permission prior to using the work, if necessary.

When posting articles to the Learning management system (CMS) consider posting links instead. In lieu of digital/PDF copies of articles, persistent links from licensed electronic resources (databases) or directly from the internet can be inserted into an online course without violating copyright law. Clicking on the link in the CMS will take the student directly to the article. Fontbonne University librarians can explain how to locate persistent links from licensed electronic resources (databases) if assistance is needed

2.5.5.2 COURSEPACKS

All articles, chapters and other individual works used in print or electronic coursepacks require copyright permission. Copyright permission for coursepacks is usually granted for an academic period. To reuse a coursepack in subsequent academic periods (e.g.: semester, quarter, trimester, etc.), permission may need to be obtained again. Many copyright holders provide time-sensitive permission because their own rights may be time-sensitive and could be transferred to different copyright holders at any time.

When ordering coursepacks it is important to clarify who in your department will obtain permission for the coursepack. Deferring responsibility for copyright permission will not provide protection against a claim of copyright infringement.

2.5.5.3 DISTANCE EDUCATION AND LEARNING MANAGEMENT SYSTEMS (I.E., SCHOOLGY)

For materials under consideration in an online course that the instructor did not create, see Section 2.5.3.1 on Fair Use and Section 2.5.3.2 on the TEACH Act above. As suggested, complete the Checklist for Fair Use and obtain copyright permission prior to using the work, if necessary.

2.5.5.4 LIBRARY RESERVES

Providing that the instructor or the Fontbonne University Library owns a copy of a publication, the instructor may request that the Library place that copy on reserve without the need to obtain copyright permission. Articles are not generally accepted for Library Reserves as these should be posted to the CMS. If the instructor wishes to reproduce additional copies of a work (i.e., article) and place them on reserve for students to review, the instructor must obtain copyright permission before these items will be put on reserve.

2.5.5.5 PHOTOCOPYING

Photocopying is subject to a fair use analysis as well. A single photocopy of a portion of a copyright-protected work, such as a copy of an article from a scientific journal made for research, may be made by the individual without permission. Photocopying all the assignments from a book recommended for purchase by the instructor, making multiple copies of articles or book chapters for distribution, or copying material from consumable workbooks, all require permission. The person making the photocopies is responsible for following copyright law.

All photocopiers and scanners on campus will display an appropriate notice to remind users of their rights and responsibilities when using the equipment:

NOTICE: WARNING CONCERNING COPYRIGHT RESTRICTIONS

The copyright law of the United States (Title 17, United States Code) governs the making of photocopies or other reproductions of copyrighted material. Under certain conditions specified in the law, libraries and archives are authorized to furnish a photocopy or other reproduction. One of these specific conditions is that the photocopy or reproduction is not to be "used for any purpose other than private study, scholarship, or research." If a user makes a request for, or later uses a photocopy or reproduction for purposes in excess of "fair use", that user may be liable for copyright infringement.

2.5.5.6 REQUESTING ARTICLES THROUGH INTERLIBRARY LOAN (ILL)

The Fontbonne University Library may participate in interlibrary loan / document delivery without obtaining copyright permission provided that the "aggregate quantities" of articles or items received by the patron do not substitute for a periodical subscription or purchase of a work. Fontbonne University follows the CONTU guidelines for defining "aggregate quantities."

2.5.6 Copyrights of Students

Fixed works of an academic nature including, but not limited to, essays, research papers, artistic works, and homework assignments submitted by the student in the course of their study at Fontbonne University remain the property of the student. By submitting such works, the student gives the University the right to share such works with other faculty members, retain for reference and assessment and/or submit such works to an anti-plagiarism service.

2.5.7 Use of Technology and the Digital Millennium Copyright Act (DMCA)

Copyright protection does not disappear just because technology makes it possible for users to copy material at the click of a mouse. The 1998 Digital Millennium Copyright Act makes it illegal for anyone to tamper with technological means of controlling access. This includes electronic protections on eBooks, DVDs and CDs as well as resources found on the Internet.

2.5.8 Digital Copyright Compliance & Peer-to-Peer File Sharing

Peer-to-peer applications include programs used to share large files, such as music and movies among client computers. While these programs can be used for legitimate purposes that do not violate copyright laws, they are most often used to transmit copyrighted works without the consent of the copyright owner.

Downloading, copying and sharing material (i.e., music, movies, games, and software applications) for which the copyright holder has not given permission is against the law and in violation of Fontbonne University's Acceptable Use Policy for computing resources.

The Higher Education Opportunity Act (HEOA) of 2008, also referred to as H.R.4137, was signed into law on August 14, 2008. The HEOA includes specific statements requiring colleges and universities to comply with digital copyright laws.

Beginning in July 2009, Fontbonne University has instituted the following:

- Distribution of an annual announcement to all faculty, staff and students that the distribution of copyrighted materials without proper permissions is subject to both civil and criminal penalties
- Implementation of a bandwidth shaping device to deter unlawful file sharing
- Distribution of information on legal alternatives for file sharing

The University reserves the right to initiate penalties for violations as listed in its Acceptable Use Policy. These policies will be reviewed regularly by Fontbonne University's Vice President for Information Technology and updated as appropriate.

2.5.9 Archival Copying in the Library

It is permissible for the Fontbonne University Library staff to photocopy copyright-protected works without obtaining permission from the copyright owner, under the following circumstances:

2.5.9.1 ARCHIVAL REPRODUCTIONS OF UNPUBLISHED WORKS

Up to three reproductions of any unpublished work may be made for preservation or security or for deposit for research use in another library or archive. This may be a photocopy or digital reproduction. If it is a digital reproduction, the reproduction may not be made available to the public outside the library or archive premises. Prior to receiving any of the three reproductions permitted under this provision from another library or archive, the Fontbonne University Library or Archive must make a reasonable effort to purchase a new replacement at a fair price. The reproducing library or archive must also own the work in its collection.

2.5.9.2 REPLACEMENT OF LOST, DAMAGED OR OBSOLETE COPIES

The Fontbonne University Library may make up to three reproductions, including digital reproductions, of a published work that is lost, stolen, damaged, deteriorating or stored in an obsolete format. Any digital reproductions must be kept within the confines of the library (that is, available on its computer but not placed on a public network.)

2.5.10 How to Obtain Copyright Permission

When deciding to use a work in the classroom, the instructor should first determine if the work is in the Public Domain or is available with a Creative Commons license. If not, the next step would be to complete the Checklist for Fair Use and/or the TEACH Act Checklist (as appropriate) to discover whether an exemption is possible. When required, written permission to use copyright-protected materials should be obtained prior to using those materials. It is best to obtain permission in writing. Instructors should keep a copy of this permission with course materials.

The length of time necessary to obtain permission may vary and, where possible, it is recommended to start the permissions procedure at least six months prior to the time the materials will be used. If quicker permission is needed, let the copyright owner know this and he/she may be able respond more quickly.

See Appendix 2.5.10.1 for Sample Permission Letter.

2.5.10.1 FACT FINDING QUESTIONS

Once it is determined that copyright permission is required, the copyright holder must be located. If the copyright holder is not listed on the work, locating the appropriate person or entity to grant permission may take some investigative and creative work. A good place to start is with the publisher. Additionally, the Copyright Office of the Library of Congress (<http://copyright.gov/>) may be of assistance in locating a copyright owner if the work is registered. Note, however, that copyright protection is automatically granted to all works upon creation and that registration with the Copyright Office is not required. Inability to locate the author or publisher of a given work does not mean the material can be freely used (see Frequently Asked Questions 2.5.12.5-7 below)

2.5.10.2 INFORMATION IN YOUR PERMISSION REQUEST

The copyright holder or its agent will require the following information in order to provide permission:

- Title of the material
- Creator/author of the material
- Publisher of the material
- Description of material
- ISBN or ISSN, if applicable
- Date of publication, if applicable
- Purpose for reproduction of the item (research, commercial, educational, etc.)
- How the material is to be reproduced (e.g., photocopied, digitized)
- Where the reproduced material will be used or will appear and for how long
- Notice that the material will be used in a password-protected learning management system

Remember to request permission “for the life of the course,” not just for one semester, if possible.

2.5.11 Violations of Copyright Law

Violating copyright law carries with it serious legal ramifications, including the possibility of lawsuit by the copyright holder. Abiding by copyright law is also a matter of professional ethics. Penalties can be costly, both financially and professionally. Fontbonne University expects all faculty and staff members to comply with current law in the exercise of their job. Failure to do so puts both the individual and the institution at risk.

2.5.12 Frequently Asked Questions

Adapted from *Using Copyrighted Works in your Teaching – FAQ: Questions Faculty and Teaching Assistants Need to Ask Themselves Frequently* by Peggy Hoon, J.D.(2007) and *Show Me...Copyright from Wrong*, A presentation at MOBIUS Annual Conference 2008 by Suzanne L. Schlep, University Copyright Specialist.

2.5.12.1 ISN'T ALL EDUCATIONAL USE FAIR USE?

No! Each user of copyright protected material is responsible for compliance. Each use must be carefully assessed. If the material is not in the public domain or licensed to allow use, an exemption (Fair Use or TEACH Act) must be appropriately invoked and documented, or permission should be sought.

2.5.12.2 CAN'T EVERYTHING ON THE WEB BE USED WITHOUT PERMISSION?

No! The work is likely copyrighted and should be treated as such. Assessment needs to be made when the site says that it is in the public domain or can be used for teaching. Those claiming to give such permission may not be the legitimate copyright holder. Such claims will not protect violators should a copyright holder object to use. Look for 'Terms & Conditions' or 'Terms of Use' or similar link for information about permissions necessary for use of information on the site. These links are often near the bottom of the webpage.

2.5.12.3 I HAVE A VHS TAPE THAT IS GETTING WORN OUT. CAN I DIGITIZE IT?

If the work is available in a digital format, buy it to show in your class. If not available in digital format and it is a legal copy, it can be digitized as long as it can reasonably be described as deteriorating. The original must also be retained.

2.5.12.4 CAN I COPY A CHAPTER OR ARTICLE AS A HANDOUT FOR MY LECTURE?

You may be able to do this but you must evaluate according to the Fair Use exemption for your answer. Also, remember that copyright law never restricts you from directing your students to a link for a copyrighted work.

2.5.12.5 WHAT IF I REQUEST PERMISSION AND THEY DON'T RESPOND?

Lack of response does not translate into a passive grant of permission to use.

2.5.12.6 WHAT IF THE WORK IS OUT OF PRINT? IS THAT THE SAME AS OUT OF COPYRIGHT?

No! An “out of print” work may still be protected by copyright and should be approached as a work still in print.

2.5.12.7 WHAT IF I CAN'T FIND CONTACT INFORMATION FOR THE COPYRIGHT HOLDER? FOR EXAMPLE, THE PUBLISHER IS OUT OF BUSINESS OR THE AUTHOR IS DECEASED.

These situations present the problem of a work whose copyright holder cannot be located, despite reasonable efforts. The US Copyright Office has recognized this problem, calling such works “orphan works”. Work is being done to mitigate the liability risk involved in using such works. At the present time, however, educators must make individual decisions concerning use of such works, including evaluating the risk of liability. Those who proceed with use should document and preserve their efforts to locate the copyright holder.

2.5.12.8 DOES THE SETTING OF THE CLASS – FACE-TO-FACE OR ONLINE – AFFECT HOW I CAN USE A WORK?

The law allows different uses in different settings:

- If the use is in a face-to-face classroom, fair use or use of campus-licensed works affects determination about whether permission is needed.
- If the setting is an online course, the TEACH Act can affect the determination.
- If the course is a combination of both settings, consider which setting offers the best opportunities for the use you have in mind.

2.5.12.9 HOW DO I KNOW IF THE WORK I WANT TO USE IS COVERED BY A CAMPUS LICENSE?

You can check the digital resources / databases available on the Fontbonne University Library's website. If you have questions, contact your Library Liaison who can assist you.

2.5.12.10 DOES THE TEACH ACT ALLOW THE STREAMING OF WHOLE COPIES OF MUSIC OR MOTION MEDIA?

No! Other than permission, there is currently NO justification or protection for streaming *whole* copies of music or motion media. Licensed media may be available for this use –Films on Demand, for example. Contact your Library Liaison for details.

2.5.12.11 CAN I USE ALL OR PART OF A COPYRIGHTED MOVIE OR PIECE OF MUSIC IN MY ONLINE CLASS?

In order to fit within the TEACH ACT guideline, you may use a “reasonable” portion of a movie or piece of music. (This differs from a face-to-face class where you may play the entire work.) The copy you excerpt from must be a lawfully made copy and not specifically designed and marketed for online courses. You may digitize the reasonable portions you intend to use from a VHS or other non-digital version as long as there is no digital version available or the digital version is not encrypted. The TEACH Act does not permit you to make a DVD of online clips to be distributed to your students.

2.5.12.12 CAN I DISPLAY A COPYRIGHTED PICTURE, IMAGE, GRAPH, COMIC OR CHART IN MY ONLINE CLASS?

Yes, as long as it is a work you would have shown in a face-to-face classroom setting and you comply with the other general TEACH Act requirements.

2.5.12.13 CAN A FACULTY MEMBER SCAN A COPYRIGHTED ARTICLE AND POST IT AT A PASSWORD PROTECTED COURSE SITE FOR A LIMITED TIME?

Compliance with TEACH, fair use, or copyright permission is required. An easier answer would be to insert a persistent link from a licensed electronic resource into your course site, if available.

2.5.12.14 IF INSTRUCTORS SCAN ARTICLES, CREATE PDF FILES, AND POST IN LEARNING MANAGEMENT SYSTEMS LIKE SCHOOLGY, ARE THEY COVERED BY TEACH?

This is a very broad question and contains multiple permutations and scenarios. It is unlikely that displaying an entire article in a course website would be permitted under TEACH since TEACH only authorizes displays in an amount comparable to what would be typically displayed in a live classroom setting. As noted above, posting within a learning management system like Schoology does not relieve the faculty member from the requirements of copyright law. Consider, instead, providing a persistent link in the learning management system for your students from one of Fontbonne Library's electronic resources. There are no copyright issues involved with this option.

2.5.12.15 ARE IMAGES AND CLIP ART DOWNLOADED FROM MICROSOFT COPYRIGHTED?

Nothing is exempt from copyright. You are bound by the terms of Microsoft's End User License Agreement when using clips from their website. If you have a valid license for MS Office, you can make personal use of the clips but may not use them in a logo or create an item to be sold from the clipart, i.e., a book of clipart images.

2.5.12.16 CAN I USE A CARTOON IN CLASS -- FACE-TO-FACE OR ONLINE?

Again, consider the Fair Use provisions and the TEACH Act. If you need to request permission, this site might be helpful: <http://www.cartoonstock.com>

Appendix 2.5.3.1 Checklist for Fair Use

Fair Use Checklist

Fontbonne University



Please complete and keep a copy of this form for each possible “fair use” of a copyrighted work with your course or project files.

Name: _____

Date: _____

Course: _____

Semester: _____

Keeping in mind the use you propose, check off each option as appropriate:

1. Purpose & character of the use:

Favoring Fair Use

- ☐ Non-profit
- ☐ Education
- ☐ Research
- ☐ Criticism
- ☐ Journalism
- ☐ Parody

Total Favoring _____

Against Fair Use

- ☐ For profit or commercial use
- ☐ Entertainment
- ☐ To save costs
- ☐ Other purpose

Total Against _____

2. Nature of the copyrighted work:

Favoring Fair Use

- ☐ Published
- ☐ Out of print

Total Favoring _____

Against Fair Use

- ☐ Unpublished
- ☐ Creative or fictional (i.e., music, play scripts, poetry, short stories, fictional novels, paintings, etc.)

Total Against _____

3. Amount and substantiality of the portion to be used:

Against Fair Use

Favoring Fair Use

- ☐ Just enough to serve a fair use purpose
- ☐ Small percentage of total

Total Favoring _____

- ☐ Heart of the work
- ☐ More than is needed to serve purpose
- ☐ Large percentage of the total

Total Against _____

4. Effect of use on the potential market:

Favoring Fair Use

- ☐ Copy is not a substitute for the original product
- ☐ Copy is not for sale or widely distributed
- ☐ Copy is not available through licensed databases
- ☐ Parody – has a different market
- ☐ Orphan work – cannot locate copyright holder

Total Favoring _____

Against Fair Use

- ☐ Copy is substitute for original product
- ☐ Copy competes in sales of original product
- ☐ Copy is widely distributed
- ☐ Copy is available through licensed databases
- Copyright holder has established permissions market

Total Against _____

Four Factor Totals:

1. Purpose of the use
 2. Nature of the material copied
 3. Amount of the material copied
 4. Commercial effect
- Totals _____

For Fair Use	Against Fair Use
--------------	------------------

Tie-breaker: In ties, reexamine the second and fourth factors to break the tie.

****Based on *Fair Use Check List***

<https://copyright.columbia.edu/content/dam/copyright/Precedent%20Docs/fairusechecklist.pdf>

Appendix 2.5.3.2 TEACH Act Checklist

To ensure your copyrighted use complies with the TEACH Act you must satisfy **all** of the following:

- My institution is a nonprofit accredited educational institution or a governmental agency
- It has a policy on the use of copyrighted materials
- It provides accurate information to faculty, students and staff about copyright
- Its systems will not interfere with technological controls within the materials I want to use
- The materials I want to use are specifically for students in my class
- Only those students will have access to the materials
- The materials will be provided at my direction during the relevant lesson
- The materials are directly related and of material assistance to my teaching content
- My class is part of the regular offerings of my institution
- I will include a notice that the materials are protected by copyright
- I will use technology that reasonably limits the students' ability to retain or further distribute the materials
- I will make the materials available to the students only for a period of time that is relevant to the context of a class session
- I will store the materials on a secure server and transmit them only as permitted by this law
- I will not make any copies other than the one I need to make the transmission
- The materials are of the proper type and amount the law authorizes:
 - Entire performances of nondramatic literary and musical works
 - Reasonable and limited parts of a dramatic literary, musical, or audiovisual works
 - Displays of other works, such as images, in amounts similar to typical displays in face-to-face teaching
- The materials are not among those the law specifically excludes from its coverage:
 - Materials specifically marketed for classroom use for digital distance education
 - Copies I know or should know are illegal
 - Textbooks, coursepacks, electronic reserves and similar materials typically purchased individually by the students for independent review outside the classroom or class session
- If I am using an analog original, I checked before digitizing it to be sure:
- I copied only the amount that I am authorized to transmit
- There is no digital copy of the work available except with technological protections that prevent my using it for the class in the way the statute authorizes

From: <https://copyright.uncc.edu/copyright/TEACH/teachtools>

Appendix 2.5.10.1 Sample Permission Letter

You can use the sample letter as a model for your formal requests for permission.

2.5.3.1 INSTRUCTIONS FOR REQUESTING PERMISSION TO USE COPYRIGHTED MATERIAL

- The request should be sent, together with a self-addressed, stamped return envelope, to the individual copyright holder (when applicable) or permissions department of the publisher in question. Be sure to include your return address, telephone and fax numbers, and the date at the top of the letter.
- Be sure to confirm the exact name and address of the addressee, and call the person or publishing house to confirm the copyright ownership. A telephone call might provide important information that can eliminate much of the uncertainty and waiting for a reply.
- Email permissions are legally acceptable in most cases, but getting a genuine signature is usually best.
- State clearly who you are, your affiliation with Fontbonne University, and the general nature of your project.
- Describe precisely the proposed use of the copyrighted material. If necessary or appropriate, attach a copy of the quotations, diagrams, pictures, and other materials. If the proposed use is extensive, such as the general use of an archival or manuscript collection, describe it in broad yet reasonably specific terms. Your objectives are to eliminate any ambiguities and to be sure the permission encompasses the full scope of your needs.
- When you do use the work, give full credit as appropriate.

-- From Columbia University Libraries / Information Services, Copyright Advisory Office:
<https://copyright.columbia.edu/copyright/permissions/requesting-permission/model-forms/>

(Sample letter on next page)

Sample Permission Letter

[Date]

[Letterhead or Return address]

[Rights holder name and address]

Re: [Name of work for which permission is requested]

Dear [Sir or Madam] [Permissions Editor] [Personal name, if known]:

I am on the faculty of Fontbonne University where I teach in the [your department] department. I am in the process of creating **[describe your project]**. In my research, I have found the following work: **[name of work under copyright]**. I believe that you hold the copyright to this work and that it would have important educational value for my students. I would like your permission to include the following material from **[name of work under copyright]** in **[name of your project]**:

[Citation with source information]

[Describe how the project and material will be used].

It will be accessible to **[describe users]**.

If you do not control the copyright on all of the above mentioned material, I would appreciate any contact information you can give me regarding the proper rights holder(s), including current address(es). Otherwise, your permission confirms that you hold the right to grant the permission requested here.

I would greatly appreciate your consent to my request. If you require any additional information, please do not hesitate to contact me. I can be reached at:

[Your contact information]

A duplicate copy of this request has been provided for your records. If you agree with the terms as described above, please sign the release form below and send one copy with the self-addressed return envelope I have provided.

Sincerely,

[Signature]

[Typed name]

Permission granted for the use of the material as described above:

Name & Title: _____

Company/Affiliation: _____

Date: _____

2.5.3.2 USE OF UNIVERSITY NAME, SEAL, AND LOGO

The University's name, seal, and logo are the exclusive property of the University and, consequently, may not be used in connection with goods or services offered by any outside organization without the prior permission of the Associate Vice President for Marketing and Communications. Members of the campus community publish a considerable number of reports in the form of bulletins, circulars, scientific articles, monographs, and books, some of which are copyrighted and others of which are not. Material from such recognized publications is, of course, quotable, and proper recognition should be given to both the individual author and to the University in connection with such quotations.

Official stationery may not be used in connection with "outside activities" except with respect to those academic and scholarly activities described above. No report or statement relating to outside activities may have the name of the University attributed to it. The use of official University titles for personal gain or publicity is prohibited without the written approval of the Associate Vice President for Marketing and Communications.

Members of the campus community, either individually or collectively, shall not officially use the name, seal or logo of the University in any activity outside of the regular work of the University. Violation of this rule is regarded as sufficient cause for dismissal or expulsion.

2.6 COMMUNICATIONS AND MARKETING POLICIES

The Communications and Marketing Department looks for potential news stories that highlight faculty, staff and student activities and achievements. The office develops appropriate stories as news releases or media advisories to St. Louis area news media and other relevant media outlets. Members of the campus community with potential story ideas should draft a brief description and email it to pr@fontbonne.edu. You can also call 314-889-1467.

If members of the campus community are contacted directly by the news media for interviews, photos, or video on campus, they should notify the Communications and Marketing Department immediately before committing to any involvement.

2.6.1 Fundraising Coordination

Such activities are welcomed. However, to avoid conflicting programs, our University policy is that no person or organization on campus is authorized to solicit a corporation for a donation or gift-in-kind in the name of the University without advance written authorization from the Vice President for Institutional Advancement. This includes the solicitation of ads for ad books, sponsorships, gifts of equipment, or direct contributions of money, plus anything else that qualifies as a "donation."

2.6.2 Alumni

No person or organization on campus should send mailings or other communications to alumni or groups of alumni without advance written authorization from the Vice President of Institutional Advancement.

2.7 RESEARCH POLICIES

2.7.1 Use of Human Participants in Research

The rights of human beings who are asked to participate in research projects must be protected. Among these are the right not to be harmed, the right to self-determination, the right to privacy, the right to obtain services, the right to self-respect and dignity, the right to confidentiality, and the right to withdraw or refuse to participate without recrimination. Most importantly, human participants have the right of informed consent. (See Appendix 2.7.1.1). The policies and procedures outlined in this statement seek to secure these rights.

Fontbonne University affirms its policy to safeguard and respect the rights and welfare of human participants in research. In order to do this, the University is responsible for providing review and approval of all research which

involves human participants. All research conducted at or sponsored by Fontbonne University whether subject to or exempt from prior review, must:

1. Adhere to the Belmont Principles;
2. Be in compliance with the Nuremberg Code or one of the ethical codes developed by various professional associations; and
3. Adhere to the policies and procedures set forth herein.

This applies to all research, irrespective of funding, carried on at the University or under the University's auspices.

The responsibility to protect human participants in research has been assigned to the Institutional Research Review Board. The primary function of the board is to assist the investigator in the protection of the rights and welfare of human participants. Investigators should not bear the sole responsibility for determining the standards of ethical conduct of research involving human participants. It is necessary for others, who are independent of this research, to share in this responsibility. The use of human participants is a privilege granted to the investigator rather than a right. The policies and procedures of this board are designed to meet minimal criteria established by Federal law and regulations. See Title 45 C.F.R. Part 46). The Office of the Vice President for Academic Affairs is the administrative office for the Institutional Research Review Board.

Depending on the nature of the research and the degree of risk, there are varying levels of review. Three levels of review have been established:

1. Exempt status;
2. Expedited review; and
3. Full review.

The Institutional Research Review Board approval of a research endeavor will be valid for a period of one year from the date of the approval. A proposal or research in progress in which the instruments and/or methodology is changed must be resubmitted to the Institutional Research Review Board which will determine if a major change has taken place. It is the responsibility of the Institutional Research Review Board to determine what constitutes a major change in a proposal. Major changes in approved proposals require a review and re-approval by the board.

Research should not be initiated until confirmation of exemption or approval has been received. Anyone intending to do research involving human participants must contact the Office of the Vice President for Academic Affairs (314-889-1401) for information about procedures and sample consent forms.

2.7.1.1 INSTITUTIONAL RESEARCH REVIEW BOARD

2.7.1.2 MEMBERSHIP

Please refer to Policy Manual I section 1.6.3.6.

2.7.1.3 PROCEDURES

1. The Institutional Research Review Board members are appointed by the Vice President for Academic Affairs.
2. The Institutional Research Review Board shall meet once a year to review procedures and changes in regulations.
3. "Exempt review status" requests for approval will be reviewed by two Institutional Research Review Board members. The researcher shall be notified of the Institutional Research Review Board decision within two weeks.

4. "Expedited review status" requests for approval will be reviewed by at least three Institutional Research Review Board members. The researcher shall be notified of the Institutional Research Review Board decision within three weeks.
5. "Full review status" requests will be reviewed at meetings of the Institutional Research Review Board at which a quorum is present. A majority of the Institutional Research Review Board must approve the proposal. The researcher shall be notified of the Institutional Research Review Board decision within four weeks.
6. The Institutional Research Review Board shall use as minimal criteria for approval, the Code of Federal Regulations, Title 45, Part 46.
7. If proposed research is disapproved, the Institutional Research Review Board shall include a written statement of reasons for its decisions and give the investigator an opportunity to respond.

2.7.1.4 REQUEST FOR APPROVAL OF THE USE OF HUMAN PARTICIPANTS IN RESEARCH

2.7.1.4.1 Category Form and Procedures

All research involving human participants must be approved by the Fontbonne University Institutional Research Review Board before the research is begun. All researchers must complete research ethics training and provide documentation of completion with review requests. Choose the appropriate level of review, check the correct category, and attach the appropriate application form to your proposal. In conformity with U.S. Department of Health and Human Services regulations, there are three separate avenues for review. Please make sure that you submit the appropriate form. Direct any questions to the Office of the Vice President of Academic Affairs at (314) 889-1401.

2.7.1.5 SCREENED FOR EXEMPT STATUS REVIEW

The exempt category covers research of minimal or no risk in the following situations: (For more detailed descriptions and limitations consult Title 45, Part 46.101(b)). (See Appendix 2.7.1.4.1.1 for request forms.)

1. In established or commonly accepted educational settings, involving normal educational practices.
2. Involving the use of educational tests, survey procedures, interview procedures, or observation of public behavior, if:
 - a. The participants cannot be identified, either directly or through the identifiers linked to the subject;
 - b. The subject's responses, if they become known outside the research, could not place the subject at risk of criminal or civil liability or be damaging to the subject's financial standing, employability, or reputation;
3. Research involving educational tests not otherwise allowed under (2) if the participants are elected or appointed public officers or candidates or federal statute requires without exception the confidentiality of the personally identifiable information;
4. The use of existing data;
5. The evaluation of public benefit or service programs conducted by or subject to the approval of the department or agency head; and
6. Taste and food quality and consumer acceptance.

2.7.1.6 EXPEDITED REVIEW

Expedited Review covers all research in which risk to the subject is minimal, such as procedures involving small amounts of blood, dental plaque, moderate exercise, voice recording, etc. A complete and updated list of eligible research is published in the Federal Register by the Office for Human Research Protections. (See Appendix 2.7.1.4.1.2 for Expedited Review Guidelines.)

2.7.1.7 FULL REVIEW

Full Review involves more risk to the subject than exempt or expedited. Full review covers:

1. All research not falling into the other two categories.

Please complete and return with the appropriate application form to:

Institutional Research Review Board for the Protection of Human Participants in Research
Office of the Vice President for Academic Affairs
Fontbonne University
6800 Wydown Blvd.
St. Louis, Missouri 63105
(314) 889-1401

2.7.2 Use of Animals in Research

The wellbeing of all animals used in research projects is a priority in any project carried out by the University. Any research conducted at or sponsored by Fontbonne University that requires the use of animals is subject to review by the Institutional Animal Care and Use Committee (IACUC) and will conform to the rules and conditions set forth in the Animal Welfare Act. This applies to all research, irrespective of funding, carried on at the University or under the University's auspices.

The responsibility to protect vertebrate animal participants in research has been assigned to the IACUC, which has authority to require that personnel involved in vertebrate animal care have been properly trained, that the use of vertebrate animals is necessary and humane, and that the vertebrate animal care procedures used prior to and during all experimental protocols are appropriate and keep animal discomfort to a minimum. Requests for the acquisition and use of vertebrate animals must be submitted to the IACUC using the form available through the Office of Academic Affairs. The project must be approved prior to the purchase or acquisition of the animals in question. Approvals are for one year, and may be renewed on an annual basis. (See Appendix on page 85).

2.7.3 Scientific Misconduct

Misuse of data and/or procedures in a scientific endeavor include fabrication, falsification, plagiarism, or other practices that seriously deviate from those that are commonly accepted within the scientific community for proposing, conducting, or reporting research. It does not include honest error or honest differences in interpretations or judgments of data. Accepting that science depends on a foundation of trust and understanding that individuals engaged in a scientific study (or studies) are subject to human frailties and temptations, it must be stated that once misconduct is detected, it must be dealt with quickly in order to sustain that atmosphere of trust which is necessary for science. Scientists are expected to conduct themselves in a trustworthy manner and to take collective responsibility for detecting, judging, and controlling scientific misconduct.

2.8 MISCELLANEOUS POLICIES

2.8.1 Transportation Policies and Procedures

2.8.1.1 GENERAL INFORMATION

Any **Fontbonne employees** intending to drive Fontbonne students or prospective students on a planned University-sponsored activity *in University rented vehicles or in privately-owned vehicles* must be approved by Fontbonne University as an authorized driver in accordance with section two of this document, must hold a

Missouri Class E driver's license or equivalent from another state, and must adhere to the guidelines stated in this document. Planned University-sponsored activities include, but are not limited to, class field trips, athletic events, service projects and trips, and prospective student visits.

Any **Fontbonne students** intending to drive Fontbonne employees and/or students or prospective students on a planned University-sponsored activity in a *University rented vehicle* must be approved by Fontbonne University as an authorized driver in accordance with section two of this document and must adhere to the guidelines stated in this document. Students are not permitted to drive University-owned vehicles. Final permission for an authorized student driver to drive is at the discretion of the activity sponsor. Planned University-sponsored activities include, but are not limited to, class field trips, athletic events, service projects and trips, and prospective student visits.

Fontbonne students intending to drive prospective students on a planned University-sponsored activity in a *privately owned vehicle* must be approved by Fontbonne University as an authorized driver in accordance with section two of this document and must adhere to the guidelines stated in this document. Final permission for an authorized student to drive is at the discretion of the activity sponsor.

Groups traveling internationally may rent vehicles only for limited usage with permission of the group's divisional Vice President. The University entity responsible for organizing the trip is responsible for costs associated with the rental of vehicles for their trip and must comply with the provisions of the rental agreement or contract made with the respective rental company. Because of identified risk factors, **no 15 passenger vans may be used**. The maximum number of people in all vehicles will not exceed the number of factory-installed safety belts. Every University-rented vehicle will carry proof of Fontbonne's insurance unless traveling outside the United States. Individuals using University-rented vehicles must get proof of Fontbonne's insurance from the Vice President for Finance and Administration. It is not necessary to purchase the collision/damage waiver offered by rental companies unless traveling outside the United States.

Groups that choose to travel by airlines, trains, buses, etc., will follow the regulations stated in this document if they require rental vehicles for additional transportation once they reach their destination.

Groups intending to drive University rented vehicles or privately-owned vehicles for University-sponsored travel must complete the Driver Contract and Trip Approval form, use properly licensed and insured vehicles, and be driven by authorized drivers. A copy of such form is attached at the end of this document. Signed authorization from the group's divisional Vice President and compliance with the guidelines stated in this document are required for trip approval. Failure to adhere to the guidelines stated in this document will jeopardize future trip approvals.

Any individual who chooses to travel as a driver or as a passenger in University rented vehicles or privately-owned vehicles to attend or take part in any University-sponsored activity assumes all risks and responsibilities of such travel. The University's insurance provides collision and liability coverage on rental vehicles when the vehicles are rented in the University's name and are used for University-sponsored events. Privately-owned vehicles that are used for University-sponsored events are not covered by the University's insurance.

Current weather and road conditions will be taken into consideration when planning any trip and sources such as the Automobile Club of America (AAA) and state highway patrol offices will be consulted. Cancellation of any trip is warranted if driving conditions are considered too dangerous, a judgment that trip sponsors must defer to the appropriate divisional Vice President or designee. If a group is planning a trip to a region that is known for poor weather and road conditions during particular times of the year, the group will keep in mind the possibility of cancellation.

2.8.1.2 AUTHORIZED DRIVERS

Only Fontbonne University employees (or in certain cases, individuals receiving compensation for their services from the University or serving in a contractual or volunteer capacity) and currently enrolled Fontbonne students are permitted to qualify as Authorized Drivers. A Driving Record Release Form requesting driver authorization

must be turned in to the Public Safety Department seven (7) days prior to the trip. A copy of such form is provided in Appendix 2.9.1.2.1.

2.8.1.2.1 Driver Authorization Requirements

1. Potential drivers must be at least 21 years of age and have a valid state-issued driver's license.
2. Fontbonne employees and other individuals paid by Fontbonne or volunteers must obtain a Class E Missouri Driver's License or comparable license from another state.
3. All potential drivers will grant permission to the University to check their driving record history as maintained by the state in which the driver is licensed. This release form will be submitted to the University's Public Safety Department at least seven (7) working days in advance of the trip/activity departure time to allow sufficient processing time.
4. The Fontbonne Public Safety Department will approve or deny driver authorization based upon the following established criteria:
 - a. Individuals are not authorized to drive if they have received more than two moving violations, or more than one speeding violation, within the last 24 months.
 - b. Individuals with serious violations will not be authorized to drive until a review of the records can be completed on a case by case basis. These violations include, without limit, vehicular manslaughter, careless or reckless driving, driving under the influence, leaving the scene of an accident, etc.
 - c. Individuals who technically meet the general guidelines but have a prolonged history of moving violations will not be authorized until a review of the records is completed.
 - d. If an individual's driving record meets the above criteria, he/she will be approved as an Authorized Driver. Authorized Drivers will be approved as such on an annual basis.

2.8.1.2.2 Authorized Driver Duties and Responsibilities

1. Comply with University guidelines stated in this document.
2. Obey all traffic regulations.
3. Ensure that all drivers and passengers wear seatbelts.
4. Ensure that there is no drinking of alcoholic beverages or smoking in vehicles.
5. Ensure that no one drives more than three hours at a time without taking a break of at least one-half hour.
6. On extended trips, if more than one vehicle is being used, ensure that vehicles travel in close proximity of each other and stay in contact by cell phone, or other communication device. Cell phones may not be used by a driver while driving.
7. Fontbonne employees present on the trip are responsible for making decisions regarding driving breaks, road conditions, weather conditions, and other factors that may affect driving safety while on the trip. If no Fontbonne employee is present or able to make such decisions, then it is the responsibility of Authorized Student Drivers.
8. Ensure, when possible, the immediate suspension of driving privileges if a moving violation is received while operating a university-sponsored vehicle.
9. Report any moving violation to the Public Safety Office. The driving privileges of any Authorized Driver are automatically revoked whenever the individual receives a moving violation. Individuals who receive a moving violation must resubmit a Driving Record Release form. Driving records must be re-evaluated before revoked driving privileges are restored.
10. Pay traffic fines for any violation(s) incurred by driver.

2.8.1.3 ACCIDENTS

2.8.1.3.1 General Information

In the event of an accident, an Authorized Driver will follow the guidelines below and complete the Accident Report Form, regardless of the extent or nature of the damage caused or incurred. A copy of such form is provided in Appendix 2.9.1.3.1.1 at the end of this volume. If an accident occurs that is determined to be the fault of an authorized driver, the cost of repairs or a \$250 deductible, whichever is greater, will be charged to the driver's department or organization. If the vehicle is rented, there may be additional procedures as defined in the rental agreement.

2.8.1.3.2 Instructions in the Event of an Accident

If an accident occurs while a group is using University rented vehicles for transportation to a University-sponsored activity, an Authorized Driver is responsible for following these instructions regardless of the extent or nature of the damage caused or incurred.

1. Contact the police or other local emergency response personnel. (In most areas, emergency personnel can be reached by dialing 311 or 911 on any cell phone.)
2. Take necessary steps to prevent additional accidents at the scene.
3. Remain at the scene of the accident until a police report has been taken.
4. If there are injuries to any members of the group that require transportation to a hospital or emergency room facility, record the name, address and phone number of the facility to which injured individuals are taken.
5. Do not make any oral or written statements regarding who was at fault in causing the accident.
6. Contact designated emergency contact person for any individuals injured.
7. Contact Fontbonne's Public Safety Department to report the accident and any injuries. Public Safety can be reached at (314) 889-4357 (HELP).
8. Contact the Divisional Vice President with administrative oversight for the group.
9. Complete an Accident Report Form. Keep a copy for the group and submit a copy to the Vice President for Finance and Administration (upon return to Fontbonne or by fax (314) 719-8023, if needed immediately).
10. If the accident involves a rented vehicle, in addition to following the guidelines above, comply with any instructions provided by the rental company.

2.8.1.4 EMERGENCY REPAIRS & TOWING

If a University-rented vehicle is inoperable, the Authorized Driver is responsible for complying with procedures as defined in the rental agreement.

1. Use a Fontbonne University credit card if available to pay for repair expenses. If a Fontbonne credit card is not available, a personal credit card may be used and reimbursement obtained from the University. If the repairs are occurring during regular business hours, you may contact Fontbonne's Assistant Controller, (314) 719-8028 for a University credit card authorization.
2. Keep copies of invoices and any parts that are replaced.
3. Complete an Emergency Repair and Towing Report Form and submit it, with invoices and any replaced parts, to Fontbonne's Physical Plant upon return to Fontbonne (or fax invoice, if needed immediately, to (314) 889-4543). A copy of such form is provided in Appendix 2.9.1.4.1 at the end of this volume.

2.8.1.5 ADMINISTRATIVE OVERSIGHT

2.8.1.5.1 Trip Sponsors

Trip Sponsors are responsible for ensuring that individuals participating in the University-sponsored activity understand and agree to adhere to the regulations in this document.

2.8.1.5.2 Divisional Vice Presidents

Each Vice President is responsible for determining that the steps necessary for trip approval have been completed by groups in their area of oversight and then making the decision to approve or deny the request.

2.8.1.5.3 Public Safety Department

The Public Safety Department is the coordinating office for the driver authorization process. In this role, the Public Safety Department will:

1. Process each Driving Record Release form to obtain driving record reports.
2. Evaluate each driver's record in accordance with established criteria to determine driver eligibility.
3. Notify the supervisor or sponsor listed on the Driving Record Release form if approval is denied.
4. Maintain a Driving Record Information File of Authorized Drivers.

2.8.1.5.4 Vice President for Finance and Administration

The Vice President for Finance and Administration will provide proof of insurance forms to individuals renting vehicles to be used for school sponsored functions.

2.8.2 Parking Policies

2.8.2.1 GENERAL PARKING INFORMATION

The Fontbonne University parking areas are for use by students, faculty, staff, registered visitors and other individuals conducting business for or authorized by the University. Fontbonne University assumes no liability for loss or damage to any vehicle or its contents while parked or operated on University property.

All parking regulations are strictly enforced 24 hours a day. It is assumed that individuals parking on campus are familiar with and agree to adhere to all parking regulations. The Fontbonne University Public Safety Department has been charged with the duty of enforcing parking regulations. Parking citations will be issued for all observed violations.

During peak periods, parking on campus is difficult. If you choose to park off campus on Wydown Blvd. or other close locations, please observe the City of Clayton's parking regulations. The police enforce these regulations rigorously.

The campus speed limit is 15 m.p.h.

2.8.2.2 PARKING REGISTRATION

All vehicles operated and parked on Fontbonne University property are required to be registered and display either a current parking tag or a valid visitor's pass. A parking tag is not required for vehicles parked off campus.

Visitors conducting business with Fontbonne University from 8 a.m. to 4:30 p.m., Monday through Friday, are required to register in the Information Office, Room 101 in Ryan Hall. After normal working hours, visitors should register in the Public Safety Building across from St. Joseph's Hall. Visitors seeing students are required to register in the Public Safety Building. A parking "GUEST" pass will be issued to each visitor during the registration process. It is your responsibility to insure that your visitors are properly registered and aware of our parking regulations. Your guest may not use your hang tag.

Parking hang tags are required to be displayed on all vehicles operated and parked on campus by members of the Fontbonne community. This includes all faculty, staff, and students working, attending class, or using the facilities on campus. Food Service, Bookstore, and other contract employees assigned to the Fontbonne campus are also required to obtain a parking hang tag for their vehicle. Parking hang tags are sold in the Business Office, Room 215 in Ryan Hall.

Hang tags are sold for your personal use. Your tags may not be given away, resold, or used by other people. Misused tags will be forfeited. Citations will also be issued for the misuse of tags and violators will lose their campus parking privileges for 12 months.

Students living in the residence halls are required to purchase a resident tag. This authorizes overnight parking. Residents may not have more than one registered vehicle on campus at any given time.

Commuter students on campus after 12 a.m., Sunday through Thursday or after 2 a.m. on Friday and Saturday should register for the evening with Public Safety.

Students attending classes at an off-campus site who are either required or choose to come to the main campus must purchase a parking permit or a daily parking pass if they wish to park on campus. The cost for an annual or term parking tag is discounted for off-site students.

Your parking tag is designed to hang on the rear view mirror of your vehicle. The tag number must be facing towards the front of the vehicle. It is your responsibility to insure the complete tag is visible. If your tag is blocked by tinting or otherwise not clearly visible, your vehicle is subject to ticketing.

Tags may be purchased by the school year or term:

Full-time faculty and staff	\$150	\$100
Part-time faculty and staff	\$100	\$85
Commuter students: (more than 6 credit hours)	\$150	\$90
Commuter students: 6 or less hours	n/a	n/a
Resident students	\$180	\$105
Summer term tags		\$40

Parking hang tags may not be returned for a refund. There is a replacement fee for lost or stolen tags.

If you wish to park on campus and you do not have a regular parking tag or your tag is not available, a short-term parking tag may be purchased. Short-term parking passes are sold in the Business Office. A one-day tag is \$5 and a three-day tag is \$10. Seven-day passes are \$15 and a monthly tag is \$40. The one-day and three-day tags may also be purchased after hours at the Public Safety Office.

Faculty, staff, students, and contract employees may not use "GUEST" hang tags. A \$50 fine will be assessed for misuse of a "GUEST" hang tag.

The purpose of a parking hang tag is to identify vehicles that have been authorized to park on University property. The tag is used to help identify unauthorized parkers and does not guarantee the availability of a parking space.

2.8.2.3 PARKING AREAS

Parking lots on campus are open to all Fontbonne parkers unless restricted by signage. The parking of a vehicle is prohibited in any portion of a parking area that does not have a "lined" parking space. Improperly parked vehicles are subject to ticketing, booting, and towing.

The Horseshoe is reserved for employee parking Monday through Friday from 8 a.m. to 5 p.m. Students may park in the Horseshoe after 5 p.m. Reserved spaces are marked by signs. The visitor spaces in the Horseshoe are reserved strictly for visitors from 8 a.m. to 10 p.m., Monday through Friday.

2.8.2.4 VIOLATIONS

Fines will be assessed for violating provisions of these regulations as outlined below:

Parking Without Authorized Tag:	\$25	Fire Lane:	\$25
Unauthorized Overnight Parking:	\$25	Tag Misuse:	\$50
Careless/Imprudent Operation:	\$50	Visitor's Space:	\$25
Improperly Displayed Tag:	\$25	15-Minute Zone:	\$50
Moving/Violating Traffic Cone:	\$50	No Parking Area:	\$25
Unauthorized Parking Area:	\$25	Reserved Area:	\$50
Occupying 2 Spaces:	\$25	Faculty/Staff Zone:	\$25
Handicapped Zone:	\$50	Wheel Locking Fee:	\$50

Parking fines will be reduced by \$10 if paid within 2 working days from the date of the ticket. The wheel lock fee may not be reduced. Tickets paid at the reduced rate may not be appealed.

Using an altered or forged hang tag is a crime. Violators will be ticketed, lose their campus parking privileges for 12 months, and are subject to criminal prosecution.

If you are a student, all assessed fines will be applied to your account. No grades or transcripts will be issued until outstanding fines are paid. Registration for the next term cannot be completed until fines are paid.

Individuals not having a student account with Fontbonne must pay outstanding fines within 7 days from the date the ticket is issued. Individuals not paying assessed fines within this grace period will lose their privilege to park on campus. Vehicles owned or operated by these individuals will be placed on the wheel lock list. A charge of \$50 plus the amount of the outstanding fines must be paid before a locked vehicle is released. Employees are encouraged to apply for payroll deduction in the Business Office to pay for outstanding parking fines before being placed on the wheel lock list.

An individual receiving 4 or more tickets in a 30-day period or 8 tickets within one academic term will be classified as a habitual violator. With each subsequent parking violation, vehicles owned or operated by habitual violators will be wheel locked until the assessed fine is paid.

All fines should be paid at the Business Office, Room 215 Ryan Hall, between 8:30 a.m. and 4:30 p.m., Monday through Friday. If you wish to pay by mail, please include your name, telephone number, and the parking ticket number with your payment. Your payment should be mailed to: *Fontbonne University, Business Office, 6800 Wydown Blvd., St. Louis, Missouri, 63105-3098.*

2.8.2.5 PARKING APPEALS

Parking tickets may be appealed. Appeal forms are available from the Department of Public Safety or the Mailroom. Appeals must be filed with the Public Safety Department within 7 working days from the date of the ticket you are appealing. Appeals not received within this time period will not be considered. Fines will not be payroll deducted or applied to an account until the initial appeal process has been completed. Forgetting to hang your tag, not knowing the parking regulations, running late, and the lack of a parking space are not considered acceptable reasons to appeal a parking ticket.

A second appeal may be made to the Parking Appeal Board if you feel your first appeal was not fairly considered. Appeals to the Board must be submitted in writing only on the Board appeal form. Second appeals must be received within 21 days from the date of the ticket that you are appealing. Forms for this appeal may be obtained from the Public Safety Director's office, Room 101-B in Ryan Hall.

2.8.2.6 VEHICLE TOWING

Individuals violating our parking regulations are subject to having their vehicles immobilized by the use of a wheel lock. This is done in lieu of towing vehicles from our property. However, vehicles are subject to immediate towing if they are parked or left unattended in a location that impedes traffic, blocks an unloading zone, fire lane, or otherwise creates a safety hazard.

Vehicles not properly licensed, not in operating condition or that have been or appear to have been abandoned are subject to towing. If your vehicle becomes disabled, please notify the Department of Public Safety.

An immobilized vehicle is subject to towing after 48 hours if it remains unclaimed or if outstanding fines remain unpaid.

Vehicles are towed at the expense of the owner. Fontbonne is not responsible for damage to towed vehicles or to vehicles that have been immobilized using a wheel lock. Contact the Department of Public Safety at extension (314) 719-4357 (HELP) for information regarding towed vehicles.

If you have visitors on campus to see you, please have your guests register at the Public Safety Office across from St. Joseph's Hall. Visitors will be issued a guest pass for their vehicles. Unregistered vehicles are subject to ticketing, booting, and towing. If no one is available at the Public Safety Office please go the Information Office located on 2nd floor of Ryan Hall.

2.8.3 Library

The library supports the mission, curriculum, and values of Fontbonne University:

1. By providing a gateway to information resources for learning, teaching, and research;
2. By teaching information literacy skills for life-long learning; and
3. By offering quality user-centered information services to all members of the Fontbonne community.

Additional policies of the University library are available in the library and online: <https://library.fontbonne.edu>.

2.8.4 Bulletin Boards

Bulletin boards are located in some campus buildings. Some boards are identified for use and are used by specific departments or campus organizations. Others are open for posting of notices.

Below are guidelines for posting notices:

1. All signs must have the stamp of approval from the Student Affairs office. Signs without this stamp will be removed. The Director of Leadership Education and Student Activities or designated representatives within the Student Affairs office are the only people who can approve signs to be posted. Departments and student organizations that have their own bulletin board do not need approval to hang signs on their own board.
2. Only registered student organizations, departments, and offices may post signs on public campus bulletin boards.
3. Job listings outside of the Fontbonne community are to be posted only in the Career Office job-listings binders or on the Fontbonne Career Services website.
4. Any signs selling materials, goods, or services can be posted only on the Community Boards, which are located in Medaille Hall and in the DSAC Caf^e. Only one copy may be posted at each location.

5. Any individual member of the Fontbonne community who wishes to post a sign (other than on the Community Board) must have the sponsorship of a department, office, or registered student organization. For example: If a student wants to post a sign about cutting down all trees in the world, he would need to get sponsorship from a student organization or a department (i.e. Student Activities). The sponsoring body must have its name on the sign.
6. Any non-Fontbonne organization wishing to advertise events on campus must be sponsored by a Fontbonne student organization, office, or department. The sponsoring Fontbonne body must have its name on the sign.
7. All signs will be dated when approved and must be taken down by the sponsor two weeks after the date on the sign. The Director of Leadership Education and Student Activities may consider longer postings on a case by case basis.
8. Signs may not be hung on any type of glass (i.e. doors or windows). The Department of Residential Life reserves the right to hang signs on the doors and windows of the residence halls in order to get necessary information to the students on campus. It is up to individual departments or offices to decide to post signs on their own glass doors or windows.
9. Lawn signs are permissible but must be approved by the Director of Leadership Education and Student Activities.
10. If a student organization fails to follow this posting policy, it will lose its right to hang signs.
11. No sign will be approved that advertises anything that violates any University policy.
12. The fact that a flyer or notice is posted on a campus bulletin board does not mean that the University endorses the message.
13. Internal postings may be hung in the following locations:
 - a. Ryan Hall: student dining hall, back entrance to right of wood walls; front main doors entering or exiting the dining hall; stairwells, first floor stairwells next to door; arcade entrance to building right wall.
 - b. East Building and Anheuser-Busch Hall: arcade entrance to the right on wall; horseshoe entrance to the right on wall; bulletin boards by stairwells.
 - c. Library: ask someone at desk to post.
 - d. St. Joseph's Hall: bulletin board next to elevator; first floor fire doors.
 - e. Medaille Hall: second floor doors; bulletin boards, walls to right of main entrance.
14. Any signs displayed in unapproved areas will be removed.

2.8.5 Solicitation and Distribution of Materials

Employees, students, or other persons affiliated with the University may not engage in any form of solicitation or canvassing to the University community or to the general public for the purpose of raising funds or support for any University organization or activity without such written approval. Persons who are neither an employee, student or otherwise affiliated with Fontbonne University may not engage in any form of solicitation or in the distribution of any literature or any other materials at any time on any of the University's premises without prior written authorization of the University President or a designee. An employee may not solicit for any purpose or distribute any materials or literature of any kind to other employees when either employee is on working time.

2.8.6 Reservation of Facilities

Campus facility rental requests are coordinated by the General Services Office. For information on facility rental policies, availability, and rental rates, please contact the General Services Manager at (314) 719-8037. The University reserves the right to rent to individuals and organizations that are in support of its missions and values, as determined by the University in its sole discretion.

2.8.7 Campus Ministry

The Department of Campus Ministry offers liturgies, prayer services, faith sharing groups, alternative spring break trips, and opportunities for conversation and dialogue for the campus community

2.8.8 University Bookstore

The Fontbonne Bookstore is located in Ryan Hall on the first floor. It is a full service bookstore offering new and used textbooks. Other items stocked are imprinted sportswear, greeting cards, imprinted gift items, personal convenience items, and other merchandise for University students. Individuals may pay by cash, check, Visa/MasterCard, Discover, or American Express.

2.8.9 Lost and Found

All lost articles, found anywhere on campus, should be given to the Public Safety officer on duty. Individuals are encouraged to put their names on all personal articles. Call extension 4357 (HELP) for assistance.

2.8.10 Non-liability of the University

Fontbonne accepts no liability for the debts of its students, nor will the University act as an agent for outside organizations in collecting student debts. The University is not responsible for injuries or losses of property.

2.8.11 Theft

Fontbonne is not responsible for replacement, reimbursement, or investigation of lost or stolen personal property. Missing items should be reported to the Student Affairs office and the Public Safety Office.

2.8.12 Food Services

There are two dining locations on campus: The Ryan Hall Dining Room and the Griffin Grill in the Dunham Student Activities Center.

2.8.13 Mail Service

Resident students' mailboxes are located near the east entrance of Medaille Hall. Messages, with the student's name and box number on the outside, can be left in the campus mailroom which is located on the first floor of Ryan Hall. Incoming mail is sorted and delivered to student mailboxes daily except for weekends and holidays. Packages or pieces of mail too big for the mailbox will be held in the mailroom for pick-up. A note of such a package will be placed in the student's mailbox. Faculty and staff mailboxes also are located in the mailroom in Ryan Hall. Mailroom personnel can assist in getting messages to faculty, administrators, and resident students.

The campus mailroom can send standard letters (including foreign), postcards, certified return-receipt mail, and packages (within the U.S. only). A book of stamps may be purchased in the Business Office. Larger packages can be sent via UPS or Federal Express from the mailroom for an additional pick-up charge plus postage. Check with the mailroom for the current additional pick-up fee. All transactions will be processed only by local checks or cash.

The mailroom can send standard letters and post cards to addresses outside the United States, and cannot send insured mail, packages, or registered mail to those addresses and must be taken to a local Post Office. There is an outside mailbox between Ryan and the East Building. Mail is scheduled to be picked up from this box at 10:00 a.m., 12:54 p.m., and 5:00 p.m. Monday through Friday and 12:00 noon on Saturday.

2.8.14 Phone Service

To report trouble with a phone line, or if you have questions regarding telephone services, please contact the information technology office located on the third floor of Ryan Hall, ext. 8095. Between the hours of 4:30 p.m. and 8:00 a.m., call ext. 1498 and leave a voice mail message that includes your name, room number, extension, and description of the trouble you are experiencing.

2.8.15 Vending Machines

A variety of snack, juice, and soda machines are located on the first and or second floors of classroom buildings and residence halls. Soda and snack machines are also located on the first floor of the DSAC. Additional snack, juice, soda, coffee, sandwich, and ice cream machines are located on the first floor of Ryan Hall. There is a change machine located in Ryan Hall on the first floor. See the mailroom for refunds on the vending machines for damaged products, complaints or suggestions for better service.

2.8.16 Bicycles

Bicycles are welcomed and encouraged on campus. There are bike racks in front of Medaille Hall and along the side of the Library. All bikes should have some form of owner identification. Unattended bikes should be locked and secured. All resident students must register their bicycles with Public Safety. All bicycles must be removed at the end of the spring semester term. Any bicycles left after the end of the spring term will be removed and disposed of.

2.8.17 Nursing Room

Fontbonne University is committed to complying with the Patient Protection and Affordable Care Act ("PPACA") requirements to provide reasonable breaks and private locations for employees to express breast milk for up to one year after giving birth.

Fontbonne supports staff, faculty, and students who are breastfeeding by offering a designated nursing room, located in the Student Affairs Office on the first floor of Medaille Hall. This room provides a clean, private, comfortable space, an electrical outlet, a chair, and a table for the breast pump and is available during normal business hours of 8:00am-4:30pm, Monday-Friday when the University is open.

**Appendix 2.0.1 ACKNOWLEDGMENT AND RECEIPT OF THE FONTBONNE
UNIVERSITY POLICY MANUALS**

I acknowledge that I have received access to the Fontbonne University Policy Manuals that are applicable to me, and I will review and comply with their contents.

I understand and agree that all provisions in the Policy Manuals must be followed at all times. I understand that the University reserves the right to make any adjustments or changes at the University's discretion.

Printed Name

Signature

Date

Read, understand, sign, date and return this Acknowledgement form to Director of Human Resources.

ACCESS TO HIGHER EDUCATION

ACADEMIC ACCOMMODATIONS FOR STUDENTS WITH DISABILITIES/IMPAIRMENTS

FONTBONNE UNIVERSITY



**The Kinkel Center for Student Success, Advising, and Engagement
Fontbonne University Ryan Hall, Third Floor
6800 Wydown Boulevard
St. Louis, Missouri 63105**

**Regina Wade Johnson M.A.S.A
Email: rwadejohnson@fontbonne.edu
Academic & Disabilities Resources Coordinator**

**Amy Simons M.S.Ed
Director of Student Success & Retention
Email: asimons@fontbonne.edu**

**Phone: (314) 889-4571
Fax: (314) 719-3614**

Notice of Nondiscrimination

Fontbonne University does not discriminate on the basis of race, color, religion, age, sex, gender identity, sexual orientation, national origin, disability, genetic information, or any other characteristic protected by applicable law in employment or in the administration of its educational policies, admission policies, educational programs, scholarship and loan programs, or athletic and other programs and activities. Furthermore, Fontbonne University prohibits retaliation against anyone who either opposes unlawful discrimination, assists or participates in an investigation of a complaint of discrimination, or exercises that person's rights under any law that forbids discrimination.

The Fontbonne University coordinator for Section 504 of the Rehabilitation Act of 1973, the Age Discrimination Act of 1975, Titles VI and VII of the Civil Rights Act of 1964 and other laws and regulations prohibiting discrimination is:

Director of Human Resources
Fontbonne University
6800 Wydown Boulevard
St. Louis, MO 63105
Phone: (314) 889-1493
Email: LPipitone@fontbonne.edu

The Fontbonne University Title IX Coordinator and Deputy Coordinators for Title IX of the Education Amendments of 1972 are:

Title IX Coordinator
Carla Hickman Associate Vice President for Student Affairs
Fontbonne University
6800 Wydown Boulevard
St. Louis, MO 63105
Phone (314) 889-1416
Email: chickman@fontbonne.edu

Deputy Coordinator
Danielle Doerfler
Associate Athletic Director
Fontbonne University
6800 Wydown Blvd.
St. Louis, MO 63105
Phone: (314) 889-4540
Email: ddoerfler@fontbonne.edu

Questions about this non-discrimination policy and any complaints of discrimination shall be directed to the appropriate coordinator. Fontbonne University complies with the Family Educational Rights and Privacy Act of 1974, Public Law 93-380, as amended.

Fontbonne University's Mission Statement

"Fontbonne University, a Catholic institution sponsored by the Sisters of St. Joseph of Carondelet, is committed to the common good through the daily pursuit of transformative education, inspiring students to become global citizens who think critically, act ethically and serve responsibly."

The following document addresses the need for the inclusion of all students into the academic life of Fontbonne University. It is the intent of Fontbonne University to offer academic accommodations to qualified students with documented physical or mental impairments, unless the University can demonstrate that the academic requirements are essential to the instruction being pursued or to any directly related licensing requirement, or that the academic accommodations would fundamentally alter the course or would result in an undue burden.

What is the Americans with Disabilities Act (ADA)?

The Americans with Disabilities Act of 1990 and the Americans with Disabilities Amendments Act of 2008 (ADAAA) are the civil rights guarantee for persons with disabilities in the United States. They provide protection from discrimination for individuals on the basis of disability/impairment.

The Americans with Disabilities Act of 1990 upholds and extends Section 504 of the Rehabilitation Act of 1973, which states:

"No otherwise qualified person with a disability in the United States shall, solely by reason of her or his disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination under any program or activity receiving Federal financial assistance."

Who is a "person with a disability" as defined by the ADA and Section 504?

The term "disability" means, with respect to an individual:

1. Having a physical or mental impairment which substantially limits one or more major life activities of the individual;
2. having a record of such an impairment; or being regarded as having such an impairment.

A "physical or mental impairment" means (1) any physiological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological; musculoskeletal; special sense organs; respiratory, including speech organs; cardiovascular; reproductive, digestive, genitor-urinary; hemic and lymphatic; skin; and endocrine; or (2) any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities. Physical or mental impairments include, but are not limited to, such contagious and non-contagious diseases and conditions as orthopedic, visual, speech, and hearing impairments, cerebral palsy, epilepsy, muscular dystrophy, multiple sclerosis, cancer, heart disease, diabetes, mental retardation, emotional illness, specific learning disabilities, HIV disease (whether symptomatic or asymptomatic), tuberculosis, drug addiction, and alcoholism.

What is a "major life activity"?

Major life activities include, but are not limited to, walking, seeing, hearing, eating, sleeping, standing, lifting, bending, reading, concentrating, thinking, communicating, speaking, breathing, learning, working, caring for oneself, and performing manual tasks. A major life activity also includes the operation of a major bodily function, including but not limited to, functions of the immune system, normal cell growth, digestive, bowel, bladder, neurological, brain, respiratory, circulatory, endocrine, and reproductive functions.

Who is a qualified person with a disability under Section 504?

A "qualified person with a disability" is one who meets the requisite academic and technical standards required for admission or participation in the post secondary institution's programs and activities.

Section 504 protects the civil rights of individuals who are qualified to participate and who have disabilities as defined by the ADA, ADAAA and Section 504.

Who is eligible for services?

Any Fontbonne University student is eligible for services under the following conditions:

- The student has an obligation to self-identify that he or she has a disability/impairment and that he or she needs accommodation.
 - A student must submit a *Request for Academic Accommodations* form to the Academic & Disabilities Resources Coordinator of the Kinkel Center for Student Success, Advising, and Engagement who serves as the Fontbonne University Section 504/ADA Coordinator. The Kinkel Center is located on the third floor of Ryan Hall. The student requesting an academic accommodation or support service must submit a new form each year if he or she is requesting an accommodation or support service related to his or her class work.
 - The student must submit reasonable, appropriate, and verifiable documentation that complies with Section 504 of the Rehabilitation Act and Title III of the Americans with Disabilities Act. The University will request documentation for the purpose of establishing a disability in order to help the University work interactively with the student to identify appropriate accommodations or services. The focus will be whether the documentation adequately establishes the existence of a current disability and the individualized need for an academic accommodation or service. It is expected that the student will submit documentation at the time of the request, but, when necessary, a grace period of 30 days will allow students to present documentation unless extenuating circumstances exist and additional time is needed.
 - The documentation required by Fontbonne University will vary according to the type of disability. For instance, an attending physician usually documents health impairments. Hearing impairments should be documented by an audiogram administered by a licensed and certified audiologist. If it is necessary for the University to confer with the health care provider(s) or other professional(s) to determine the reasonable, appropriate accommodation, a release will be requested from the student.
 - To insure that Fontbonne University is able to provide the appropriate academic accommodation or support service, the student must provide Fontbonne with reasonable notice of his or her need for the academic accommodation or support service. Some requests may take several weeks to process, such as books in an alternative format or specific electronic devices necessary for learning. The Academic & Disabilities Resources Coordinator of the Kinkel Center for Student Success, Advising, and Engagement will notify instructors via email of academic accommodations at least one week prior to the scheduled first day of class for the semester. Therefore, students should submit a request for academic accommodations to the Academic & Disabilities Resources Coordinator, along with any supporting documentation, at least 30 days before the semester begins or as soon as reasonably possible.
-

After a student has provided documentation of a disability, what happens next?

1. After the documentation has been received and reviewed (please allow 48 hours for this process), a student may make an appointment at the Kinkel Center for Student Success, Advising, and Engagement to request specific accommodations or fill out the *Request for Academic Accommodations* form. The specific accommodations requested must be substantiated by information that was presented in the documentation.
2. At the time of the appointment, the Academic & Disabilities Resources Coordinator will engage in an interactive process to determine an appropriate academic accommodation based on the student's disability supporting documentation.
3. The Academic & Disabilities Resources Coordinator may need to secure additional information or speak with the referring party. The Coordinator will ask for a signed release before anyone is contacted.
4. Accommodations for disabilities at Fontbonne University are individualized to meet the needs of the specific student. After a determination has been made regarding reasonable and appropriate accommodations or support services, the Academic & Disabilities Resources Coordinator will notify, via email, instructors listed on the *Request for Academic Accommodations* form of the approved academic accommodations at least one week prior to the scheduled first day of class for the semester.
5. Instructors and faculty are notified **only** about the accommodations; the nature of the student's disability is not specified. All documentation regarding a student's disability is treated as confidential and is secured in a locked file in the office of the Academic & Disabilities Resources Coordinator of the Kinkel Center for Student Success, Advising, and Engagement. Notification of accommodations occurs through campus email at least one week before the beginning of the semester (assuming the student has sought an accommodation and provided the required documentation in advance of the start of the semester), or within 48 hours of receipt of the *Request for Academic Accommodations* form.

Testing Accommodation - Student Responsibilities:

1. When the student wants a test with accommodations, it is the student's responsibility to:
 - Sign up for a proctor through the online scheduling program that is available on the Kinkel Center for Academic Resources web site. Students who need to have a scribe or have their tests read aloud must request these services at least 48 hours in advance of the test to allow time for adjustment of staff schedules. It is not the instructor's or faculty member's responsibility to schedule a test for a student.
 - Remind the instructor that the student needs to have a test administered in the Kinkel Center. This notification should occur not less than 48 hours before the test so that the test can be forwarded.
 - Notify the Academic & Disabilities Resources Coordinator immediately if accommodations are not being made or if there is any question about the implementation of academic accommodations.
-

Testing Accommodation - Faculty Responsibility:

Tests should be delivered to The Kinkel Center for Student Success, Advising, and Engagement by the instructor or a designee in a sealed envelope that gives specific directions for the administration of the test. These envelopes are available in the mailroom, Ryan Hall, first floor, and in the Kinkel Center. If more than one test is to be given, each test should have its own envelope, for security reasons.

Family Education Rights and Privacy Act of 1974 (FERPA) Regulations:

University students are regarded as adults by colleges and universities. Because of the regulations specified in the Family Education Rights and Privacy Act of 1974 (FERPA), Fontbonne University generally will not release information about accommodations to parents or guardians of students with disabilities without the student's written authorization.

Fundamental Alterations to Course

The University does not have to provide an academic accommodation if the University demonstrates that the academic accommodation fundamentally alters the course or would result in an undue burden, or that the academic requirements are essential to the instruction being pursued or to any directly related licensing requirement.

What are some of the typical accommodations or support services that may be made available to Fontbonne students with learning disabilities?

- Extended Test Time (Double/Time and a half)
- PowerPoint slides/notes
- Note-takers
- Audio recording class lectures
- Testing in a reduced-distraction environment/Individual room
- Tests that are read aloud, taped, scribed or on computer
- Instructor notification
- Preferential seating
- Flexible deadlines
- Excused Absences
- Advising and counseling

Accommodations are arranged on a case-by-case basis by the Academic & Disabilities Resources Coordinator to insure that the individual needs of students are being addressed. Accommodations are determined by an examination of documentation provided by the student and through consultation with the individual student. It is sometimes necessary to examine the nature and the cost of a specific accommodation and to determine whether or not providing the accommodation will cause an undue financial or administrative hardship for the University.

What some of the typical academic accommodations or support services that may be made available to students with physical disabilities?

There are a variety of orthopedic/mobility disabilities resulting from congenital conditions, accidents, or progressive diseases. Some disabilities are temporary in nature. Accommodations for these disabilities may include:

- Accessible location for class or meetings with faculty
 - Extra time to get to classes, particularly in inclement weather
 - Special seating in classrooms
-

- Note-takers, use of tape recorders
- Testing accommodations
- Accessible parking spaces
- Lockers to store materials

Exclusions:

Section 104.44(d)(2) of the regulations regarding the Rehabilitation Act provides that personal attendants, individually prescribed devices (such as wheelchairs), readers for personal use or study, or other devices or services of a personal nature are the responsibility of the student, not the University.

What should I do if I need books in an accessible format?

It is the responsibility of students to acquire textbooks for courses. If a student requires a textbook in an alternative format such as on tape, CD, or electronic format, the student must order the materials in a timely fashion, usually six to eight weeks before the beginning of the semester. Information on various services is available in the Kinkel Center for Student Success, Advising, and Engagement.

What are some of the discriminatory acts that are prohibited by the ADA and Section 504?

Colleges and universities receiving federal financial assistance must not discriminate in the recruitment, admission, or treatment of students. Students with documented disabilities may request modification, accommodations, or auxiliary aids that will enable them to participate in and benefit from all post secondary educational programs and activities. Post secondary institutions must make such changes to ensure that the academic program is accessible by all students, unless the University can demonstrate that the academic requirements are essential to the instruction being pursued or to any directly related licensing requirement.

Under the provisions of Section 504, universities and colleges may **not**:

- Limit the number of students with disabilities admitted;
- Except under circumstances specified in the Rehabilitation Act of 1973 regulations, make pre-admission inquiries as to whether or not a student is disabled;
- Use admission tests or criteria that inadequately measure the academic qualifications of disabled students because special provisions were not made for them;
- Exclude a qualified student with a disability from any course of study;
- Limit eligibility to a student with a disability for financial assistance or otherwise discriminate in administering scholarships, fellowships, internships, or assistantships on the basis of disability;
- Counsel a student with a disability toward a more restrictive career;
- Measure student achievement using modes that adversely discriminate against a student with a disability.

Code of Student Conduct Violations

Every Fontbonne University student is subject to the rules of conduct as specified in the University Code of Student Conduct. There are no exceptions or exemptions for students with disabilities, or for any other Fontbonne University students.

What recourse is available to a student who feels that his or her needs for accommodation are not being met?

If a student is not satisfied with any decision by the University involving accommodations, modifications, or auxiliary aids or services, or otherwise believes she or he has been discriminated against on the basis of disability, the student may contact the designated coordinator and/or file a complaint of discrimination in accordance with the University's anti-discrimination grievance procedure set forth in Fontbonne University Policy Manual Volume II, Campus Community Policies, section 2.1.2. The student may contact the Director of Student Success & Retention prior to or after a complaint of discrimination is filed to attempt to resolve the complaint informally, but any informal or voluntary resolution attempts after a complaint is filed will not delay the investigation of the complaint.

Where can a student go to request academic accommodations?

For academic accommodations, contact:

Regina Wade Johnson

Academic & Disabilities Resources Coordinator

E-mail: rwadejohnson@fontbonne.edu

Amy Simons

Director of Student Success & Retention

E-mail: asimions@fontbonne.edu

Fontbonne University Ryan Hall, Third Floor

Phone: (314) 889-4571

Fax: (314) 719-3614

Fontbonne University Policy Manual Volume II, Campus Community Policies, section 2.1.5.2

Student with Disabilities/Impairments

Fontbonne University offers accommodations to students with documented physical, visual, hearing, learning, psychiatric disabilities or impairment. Any Fontbonne student is eligible for special services or accommodations if:

- 1. The student self-identifies that he or she has a disability/impairment and needs accommodation.*
- 2. The student provides appropriate and verifiable documentation of the disability/impairment.*
- 3. The student provides notification in a timely fashion. For accessibility and resident hall needs, contact Student Affairs at 889-4523. For academic accommodations, contact the Kinkel Center for Student Success, Advising, and Engagement, at 889-4571.*

For requests or inquiries regarding other accommodations, including auxiliary aids or services, or modifications of policies or procedures to participate in a program, service, or activity, or the existence and location of services, activities, and facilities that are accessible to and usable by individuals with disabilities/impairments, please contact the Academic & Disabilities Resources Coordinator, Regina Wade Johnson, at 314-719-3627, or rwadejohnson@fontbonne.edu.

Fontbonne University
Advancement

Grants Management Policies and Procedures

March 2021

Updated and approved March 9, 2021

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Preface

This manual of Grants Management Policies and Procedures has been prepared by the university Advancement department to assist Fontbonne University faculty and staff interested in seeking grant funding to support programs, research, projects, and other scholarly activities. All government grant activity conducted by Fontbonne University must comply with [2 CFR 200](#) (uniform administrative requirements, cost principles, and audit requirements for federal awards). The purpose of this manual is to collect, in one resource, the current policies and procedures relating to grants development, submission, and management at Fontbonne University. Within Advancement, the Director of Grants manages grant activities and can assist with questions regarding grant development and management.

For Advancement and the Director of Grants to be a successful and effective resource, it is essential for faculty and staff to be familiar with the grant management policies and procedures as well as the guidelines of funding agencies to which grants are being submitted.

Attention and special consideration of the following are required when seeking grant support:

- Project goals and outcomes and fit with university mission
- Budget
- Human resources
- Capacity
- Human and animal research regulations (if applicable)
- University liability
- Allowable costs
- Administrative obligations

It is imperative that appropriate review and approvals are obtained when seeking grant funds. In most cases, approval from the Department Chairperson, Dean, and Finance Office are required *before* grant development and submission. This initial review is required to surface any potential challenges prior to the grant deadline.

One of the main goals of Advancement and the Director of Grants is to facilitate and foster a creative, collaborative, effective, and efficient grant development experience.

General Policies and Procedures

Fontbonne University Mission Statement

Fontbonne University, a Catholic institution sponsored by the Sisters of St. Joseph of Carondelet, is committed to the common good through the daily pursuit of transformative education, inspiring students to become global citizens who think critically, act ethically and serve responsibly.

Policy and Mission Statement

Advancement is dedicated to building and sustaining meaningful relationships with private and public grant funding organizations. The office works with Fontbonne leadership, faculty, staff and students to raise funds, secure resources, and develop opportunities and partnerships to advance the mission of the university.

The Director of Grants is responsible for assisting faculty, staff, and administrators in the external grant-seeking process. The Director of Grants represents the university in the pre-award process with public and private grant makers and sponsors and acts as the liaison between principal investigators (PIs), sponsors/grant makers and university administrators. The Director of Grants will assist to ensure compliance of grant maker guidelines, regulations and institutional policies.

All applications for grants must be submitted through Advancement and the Director of Grants for institutional review before submission to a grant maker or sponsor. This review policy applies to all grant submissions utilizing Fontbonne University's 501(c) 3 status as a fiscal agent. In addition, **approvals are required by the Department Chairperson, Dean, and Finance Office** in the grant development process prior to submission.

Advancement and Grants Management

Organizational Structure

Grants management is a function of Advancement at Fontbonne University. The university President has designated Advancement responsible for the requests for and administration of grant management coordination among administrative and academic offices on campus. The Director of Grants serves as the primary staff for grant management in Advancement. The Director reports to the Vice President for Advancement.

Services Provided

The Director of Grants provides direct services for the pre-award process that include prospect research, proposal development, proofing and editing, budget review, review of compliance with university policies, review of compliance with funder guidelines, coordination and relationship development with the funder or program officer, grant submission and tracking. The Director of Grants will provide assistance in the post-award negotiations and acceptance, reporting, and information about the grant award.

The PI is the individual(s) judged by the University to have the appropriate level of authority and responsibility to direct a project supported by a grant. PI(s) are responsible for conceiving and directing the project intellectually, logistically, and financially.

Review time-line requirements to Advancement – Director of Grants

Grants are required to be reviewed in advance of submission by the Director of Grants, Dept. Chairperson, Dean, Finance Office and others in accordance with the Grant Routing Form and page 7 of this manual. All grants to private funders, such as corporations and foundations, require a minimum of 5 days for review and approval before the grant deadline of a complete draft, including narrative, budget, and supporting documents. All grants to public funders, such as federal or state agencies (e.g., NSF, NEH), require a minimum of 10 days for review and approval before the grant deadline of a complete budget and draft of the Executive Summary or Narrative. During the review process, there may be suggestions or edits made to the grant application in coordination with the PI.

Examples:

1. The ABC Corporate Fund has a deadline of October 1. The ABC Corporate Fund is a private funder, and requires a grant application to be submitted for all requests for programmatic funding. A complete draft of this proposal would be submitted to the Director of Grants on or before September 26, for review (5 days before deadline).
2. The National Science Foundation (NSF) has a deadline of Oct. 1. The NSF is a public funder, and a grant application with supplemental materials is required. A complete budget and draft of the Executive Summary or Narrative would be submitted to the Director of Grants on or before September 20 (10 days before deadline).

If the above review is not complete, grant submissions may be delayed and risk missing the grantor submission deadline.

After receiving approval from the Department Chair and Dean, the PI is advised to meet with the Director of Grants early in the grant planning process and prior to grant submission.

There are two distinct phases of grant management, pre-award and post-award. The pre-award phase includes all activities that lead up to the submission of the grant, including proposal preparation, institutional approval, and submission of the grant. The **pre-award** activities are the responsibility of the PI (sometimes including members of their department or team) and the Director of Grants. The **post-award** phase includes activities after the grant has been awarded, including grant negotiations, contract acceptance, setting up account fund, accounting and fund management, program management, and reporting. The post-award activities are the responsibility of the PI shared with the Finance Office and Advancement. It is important to note that the PI has a shared responsibility to ensure post-award activities are described in grant application and that sponsor regulations are followed, particularly 2 CFR 200 for government grants.

Proposal Development and Pre-Award Procedures

In the pre-award phase of grant development, the PI develops a proposal to submit to potential funding agencies. The Director of Grants will assist with prospect research, proposal preparation, review, submission, budget preparation and verification, and institutional approvals.

Pre-Grant Planning and Approval to Write Grant

1. When a grant is being considered for support, the PI is required to complete a concept paper or executive summary that includes the resources needed for the program to be successful (i.e. faculty, staff, equipment, training materials, space rentals, etc.). The concept paper or executive summary requires the signature of the Department Chairperson and Dean and is submitted to the Director of Grants. To simplify this process, a **Case for Support Template** is provided in **Appendix A** but is not a required format.
2. Once the concept paper or Case for Support has been submitted, the Director of Grants will contact the PI to discuss funding needs. At this time, the Director of Grants will identify potential funders which may be funding prospects for the program or initiative. These prospects will be discussed with the PI, and a plan (including timeline) for grant application(s) will be developed.

Grant Writing

1. The PI, in consultation with the Director of Grants, will develop a draft proposal and a budget, using the form provided by the funder or the **budget template (Appendix B)**, in compliance with funder guidelines and university policies.
2. On occasion, the grant writing may be outsourced to a consulting agency, such as McAllister and Quinn.

Approval Process

1. Complete a **Grant Routing Form (Appendix C)**. The Grant Routing Form is completed by the PI and submitted to the Department Chair, VP for Academic Affairs, VP for Finance/CFO, and Director of Grants for approval to submit the grant. *If more than one PI is on a grant application from separate colleges or departments, approvals are needed from each Department Chair and Dean.* Please note, that before a grant is submitted, there may be institutional approvals required in addition to this form. For example, if human or animal research is a part of the grant, Institutional Review Board (IRB) or Institutional Animal Care and Use Committee (IACUC) may be required. Please refer to the Fontbonne University Policy Manual Volume 2. The Director of Grants can assist with these approvals, but it is the responsibility of the PI to communicate with their Dean and Chairperson.

Note: At this point in the process, revisions to the grant and budget may be required before submission. Once all signatures of approval are complete, the grant may be submitted.

Completed Grant Routing Forms are to be sent to and are maintained by the Director of Grants.

Approvals required on grant submissions:

PI	All submissions	All Submissions
Department Chairperson(s) <i>*For non-academic departments, a supervisor and department head has to approve.</i>	All submissions	All Submissions
Dean	All Submissions	All Submissions
Finance Office	All Submissions	All Submissions
VP for Academic Affairs <i>*For non-academic departments, the supervising VP has to approve.</i>	Any submissions involving personnel (i.e. staff, faculty or students) or resources from a Fontbonne University college	Examples: <ul style="list-style-type: none"> • Faculty research • Summer camp program • New academic program development • Student retention and resources
President	Any submission that requires President endorsement and/or at the recommendation of the Director of Grants or VP.	Examples: <ul style="list-style-type: none"> • Title III • Bricks and Mortar • Strategic Partnerships
Board of Trustees Chairperson	Any submission that requires Board of Trustees endorsement and/or at the recommendation of the President or Director of Grants.	Example: <ul style="list-style-type: none"> • Title III • Bricks and Mortar • Strategic Partnerships

2. The grant is submitted by the Director of Grants and/or the PI, if approved to do so by the Director of Grants. Copies of the final grant submission are distributed to the PI, Chairperson, VP for Academic Affairs (or supervising VP), and VP for Finance/CFO. A copy of the grant is maintained in Advancement by the Director of Grants.

Post Award Procedures

Award Notification

When a grant proposal has been approved to award by a funder or sponsor, notification first comes to the PI and the Director of Grants. The Director of Grants forwards the notice to the Finance Office and Sr. Director of Advancement Services for processing of the award. The Sr. Director of Advancement Services is responsible for overseeing Advancement records and database, gift management details, and reporting to the Board of Trustees on gift and grant funding. The PI and/or the Director of Grants will notify administration that the grant has been approved to be awarded by the funder or sponsor. Administration for grants includes: Chairperson, Dean, VP for Academic Affairs, VP for Finance/CFO, VP for Enrollment Management / Marketing & Communication, VP for Advancement and the university President. In most cases, the notification of award requires a signature by the institutional official. The Director of Grants will review the grant notification with appropriate individuals and obtain the institutional official signature to secure the grant or contract. See the **Post-Award Checklist (Appendix D)** for tracking post-award activities.

Delegation of Authority

The university President may delegate authority to solicit, accept or execute grants and contracts to other university officials for selected purposes. It is the policy of Fontbonne University that all federal grants and contracts be approved by the VP for Finance/CFO. The Director of Grants and the VP for Advancement serve as institutional officials delegated by the President and VP for Finance/CFO to solicit and accept awards and contracts.

Amendments or Revisions

Any amendments to a grant or contract must be documented and approved. Amendments should be sent to the Director of Grants who will provide guidance and assist with obtaining the appropriate approvals needed for amendments. The PI is responsible for reporting all grant or contract activities. This includes reporting to the funder or sponsor as well as to university officials. Common amendments to grants and contracts may include changes to budget, scope of work, and personnel.

Amendments to Budget. For any changes made to the budget of a grant or contract, review and approval is required by the PI, Department Chairperson, Dean, Director of Grants and the Finance Office. The PI is responsible for reporting and requesting changes to the funder or sponsor.

Amendments to Scope of Work, Project or Program. For any changes made to the scope of work, project or program funded by a grant or contract, review and approval is required by the PI, Department Chairperson, Dean, Director of Grants and the Finance Office. The PI is responsible for reporting and requesting changes to the funder or sponsor.

Amendments to Personnel. For any changes made to the personnel of a grant or contract, review and approval is required by the PI, Department Chairperson, Dean, Director of Grants and the Finance Office. The PI is responsible for reporting and requesting changes to the funder or sponsor.

To submit an amendment for review and approval, the PI must complete the **Grant Routing Approval Form** along with the requested changes to the Director of Grants. The Director of Grants will assist with obtaining approvals necessary and can assist with notifying the program officer. Documentation for grant amendments should be retained by the PI and the Director of Grants.

Establishing an Account

After a grant is determined to be acceptable and the required agreement or contract is signed and in hand, the Director of Grants notifies the Finance Office to set up an account number for the grant. The Director of Grants schedules a meeting with the PI, Finance Office, Dean, Chairperson, administrative personnel, and anyone else who will play a key role in grant implementation and grant management. The purpose of the meeting is to review the grant agreement and reporting requirements, discuss the budget and who needs to have access to viewing it, and confirm roles and responsibilities with respect to carrying out the grant activities.

The Finance Office will then set up the account and provide budget fund information to PI, Dean and Chairperson. The Finance Office will set up fund in accordance with the following general criteria, unless otherwise agreed upon by the PI, Finance Office, Dean and Chairperson:

Fund 10

Grantor is a federal agency

OR

Grant is for multiple years

OR

Award is for \$25,000 or more.

Fund 20

Grant is for one fiscal year only.

AND

Award is for less than \$25,000.

AND

Funds will be set up as a new subfund.

Disbursement of Funds

All funds received for approved proposals will be processed by Advancement in accordance with usual procedures for gift processing. Once the award has been processed, and been assigned an account number, the PI may begin to submit purchase orders as needed. Funds will be disbursed through the grant fund established above (Fund 10, Fund 20) and then recovered from the funding agency by Finance. Funds will not be drawn from the disbursing source (e.g., ACM\$ or G5) more than three days prior to expenditure or as reimbursement after the university has disbursed unless previously approved by the agency program officer. Scholarship funds are pulled only by semester.

If, during the project, reallocation of monies between budget lines is required, the PI should request such fund movement in writing to the Director of Grants, Finance Office, Dean and

Chairperson. The Director of Grants or Finance Office will then initiate the paperwork for the necessary adjustments.

Payment to any Fontbonne University student, employee or outside personnel will be processed in accordance with Fontbonne University policies. The appropriate employee forms will be submitted to Human Resources to report that an individual is being paid salary/stipend through the grant.

The PI and/or administrative personnel will complete the relevant paperwork for payment of funds. For government grants, this process requires following the **Time and Effort Reporting Policy (Appendix E)** to report effort on a monthly basis using the **Effort Reporting Form (Appendix F)**.

Budget and Expenditure Monitoring

It is Fontbonne University policy that any active grant or contract budget and expenditures be reviewed no less than quarterly. In most cases, this will be a quarterly meeting including the PI, Administrative Assistant, Chairperson and/or Dean, Director of Grants and the Finance Office.

For approval of ongoing expenditures, it is best practice to follow university procedures for requesting payments by submitting a requisition form or personnel form to the Accounting Office. The requisition form is used for all non-personnel expenditures. The personnel form (also known as the “pink sheet”) is to be used for all personnel expenditures. Each of these forms includes a section for review and approval by a supervisor, Department Chairperson, Vice President and the Finance Office. Copies of these forms will be retained by the Accounting Office and the PI. In many cases, the administrative assistant who assists the PI will complete and retain these forms and complete transactions in the appropriate sponsor database requesting reimbursements.

Cost Transfer Policy

The full **Cost Transfer Policy and Procedure** for Fontbonne University is included in this manual as **Appendix G**.

Fontbonne University has established a policy for cost transfers to comply with federal regulations [2 CFR 200](#) (uniform administrative requirements, cost principles, and audit requirements for federal awards.) A cost transfer is a transfer of an expense onto a federally-funded grant or contract that was previously recorded on Fontbonne University’s general ledger (GL). Institutional approval is required for cost transfers.

The PI is responsible for ensuring proper monitoring and compliance of grant and contract activities. This includes compliance with federal regulations, timely corrections of errors, and proper allocation of expenses.

All cost transfers must be approved by the PI, Department Chairperson, Director of Grants and VP for Finance/CFO. In some cases, additional university representatives will be asked to review and approve a cost transfer.

Cost transfers should be reviewed and approved within 120 days of discovery. Cost transfers should be discussed and reviewed at quarterly budget and expenditure monitoring meetings.

Expenditure Approval and Bidding

For any expenditure that exceeds \$2,500, a bidding process is required. It is best practice to obtain three bids for expenditures such as equipment, supplies, or services, before approving an expenditure. The PI is responsible for approving expenditures within the approved budget. Expenditures outside of the approved budget are to be reviewed and approved at expenditure and budget monitoring quarterly meetings.

Allowable and Unallowable Costs

All grant activity conducted by Fontbonne University must comply with [2 CFR 200](#) (uniform administrative requirements, cost principles, and audit requirements for federal awards). This includes guidance on allowable and unallowable costs for federally awarded grants. See **Allowable Costs on Grants and Contracts (Appendix H)**. In addition, the specific cost policies outlined by funders or sponsors must be followed. For example, if awarded a grant from the National Science Foundation (NSF), it is the responsibility of the PI to ensure all expenditures and budget items are within the allowable costs outlined by the sponsor. Furthermore, in addition to the federal regulations and sponsor regulations and guidelines, it is the responsibility of the PI to ensure university policy for allowable and unallowable costs are followed. For example, meals may be included as an allowable expenditure, but alcohol may not be permissible. If an unallowable cost is incorrectly posted, it is immediately reclassified to the department budget upon discovery. For further guidance on allowable and unallowable costs, please contact the Director of Grants or the VP for Finance/CFO.

Participant Support Costs

PIs who receive government funding for Participant Support Costs must follow the **Participant Support Policy (Appendix I)**.

Annual/Progress and Final Reports

Financial Reports

The PI is responsible for preparing and completing financial reports required by funders. The PI may have assistance by administrative personnel in his/her department and the Finance Office.

Narrative Reports

The PI is responsible for preparing and completing all narrative reports to the funder. The PI may have assistance by the Director of Grants.

Facilities and Administrative Costs (Indirect Costs)

Facilities and Administrative (F&A) Costs are those expenses that help support the program and research effort but cannot be directly charged to the grant project. These costs include building and laboratory facilities, maintenance, utilities, library services, computer access, staff support, costs of federal compliance regulations, etc. F&A rates are negotiated by the university with the federal government and are applied to all grant budgets (unless the agency puts restrictions on these costs). Please contact the Director of Grants for the current rate for Fontbonne University. F&A costs allocation is reviewed and approved by the president and the VP for Finance/CFO on a case by case basis.

Retention of Documentation

Fontbonne University will retain award-related documents for three years after submission of the final performance and budget and expenditure report. It is the responsibility of the PI to retain all documents. The Director of Grants will also retain copies in Advancement.

Institutional Policies for Compliance**Human Participants**

Federal regulations (Title 45 Code of Federal Regulations Part 46) require that an Institutional Review Board (IRB) be established to help protect human research participants from risk that might result from their participation in a research study. The IRB's role at Fontbonne University extends to all research involving human participants whether conducted by faculty, staff, graduate students, or undergraduate students. All research projects involving human participants, whether conducted on- or off-campus, must be reviewed and approved by our IRB before recruitment of participants begins. The Office of Academic Affairs is the office of record for the IRB and will keep all forms and documentation for the required 7 years.

IRB Policies may be located in the Fontbonne University Policy Manual Volume 2.

Animal Care and Use

Fontbonne University is committed to the humane care and use of animals in all activities related to research and teaching. Toward this end, Fontbonne has adopted, on an institution-wide basis, the principles regarding animal care as stated in the Animal Welfare Act (PL 89-544 and amendments), the Guide for the Care and Use of Laboratory Animals, and the Guide for the Care and Use of Agricultural Animals in Agricultural Research and Teaching. In order to accomplish the objectives inherent in these regulations and principles, the Institutional Animal Care and Use Committee (IACUC) has been established to review and approve all projects, with or without internal or external funding, that involve the use of vertebrate animals. Faculty, staff, and students are required to have research and teaching activities involving vertebrate animals housed at Fontbonne University reviewed by the committee prior to the beginning of the activities. The IACUC is authorized to request modifications, approve, withhold approval, or suspend animal-research and teaching projects. In addition to reviewing research projects, the IACUC also carries out other federally mandated functions such as reviewing and reporting on the overall animal program, inspecting and evaluating all the animal facilities at least once every six months, reviewing and investigating legitimate concerns involving the care and use of animals at the institution, and making recommendations to the President and VPAA regarding any aspect of the research, animal program, facilities, or personnel training.

IACUC policies are located in the Fontbonne University Policy Manual Volume 2.

Conflict of Interest

Conflict of Interest policies are located in the Fontbonne University Policy Manual Volume 3.

Scholarly Misconduct in Research

Scholarly Misconduct in Research policies are located in the Fontbonne University Policy Manual Volume 2.

Appendix A: Fontbonne University - Case for Support Template

TITLE OF PROJECT/PROGRAM:	
EXECUTIVE STATEMENT: In 2-3 sentences , please describe the project: What is the purpose? What will you do? With whom? Where will it take place? What makes the project unique/most important?	
How does your project align with the goals of the organization?	
What are key words that address your project? (e.g. "at-risk youth", "communication disorders", "restorative justice", etc.) This will help in researching funding opportunities.	
Who will benefit from this project?	
Is this a new project? Does the new program propose adding or changing an academic program?	
If funded, is there a match requirement?	
STATEMENT OF NEED: Describe the specific issue that your project will address. Why is it necessary? How will this project change current conditions?	The current situation is
GOALS & OBJECTIVES: What specific changes do you expect to make in the community or among the beneficiaries as a result if this project? What are your success indicators?	The three to five success indicators for our project or effort are
ACTION: What steps will be taken to achieve success for this project?	
RESOURCES: What resources do you need for this project to be successful? (<i>staff, faculty, equipment, training materials, space rentals, etc.</i>)	
EVALUATION: How will you measure your success for this project?	
BUDGET REQUESTED:	\$

Collaborative Partners: Please list any collaborators and their affiliated organizations.	
What are possible funding sources you might recommend as a fit for the project? (e.g., hospitals, law offices, foundations funding 'at-risk' youth, etc.)	
Does this project include human participants in research?	<input type="checkbox"/> No <input type="checkbox"/> Yes If yes, IRB review and approval may be required. Please see Fontbonne University Policy Manual Volume II.
Does this project include the use of animals for research?	<input type="checkbox"/> No <input type="checkbox"/> Yes If yes, IACUC review and approval may be required. Please see Fontbonne University Policy Manual Volume II.
Required Approval/Signatures:	PI(s): <i>Signature and Date</i> <i>Required</i> <i>If multiple departments are involved, all PI signatures are required.</i>
	Dept. Chairperson or Supervisor: <i>Signature and Date</i> <i>Required</i> <i>If multiple departments are involved, all appropriate chairpersons or supervisors are required.</i>
	College Dean: <i>Signature and Date</i> <i>Required</i> <i>If multiple colleges or departments are involved, all appropriate signatures are required.</i>
	VP for Finance/CFO: <i>Signature and Date</i> <i>Required</i>
	VP for Academic Affairs: <i>Signature and Date</i>
	Director of Grants: <i>Signature and Date</i>

Please return signed form to Director of Grants by e-mail or in Ryan Hall 202.

Appendix B: Budget Template

2/27/2018

_____ Program/Department, Fontbonne University

Fontbonne University _____ Program Budget (EXAMPLE)					
(Note: Add or delete expense categories as appropriate for the program you are seeking funding)					
EXPENSES	Year 1	Year 2	Year 3	Year 4	Total
Personnel					
Faculty salary/stipend					0.00
PTE Program Coordinator					0.00
Fringe benefits @ 25%	0.00	0.00	0.00	0.00	0.00
<i>Subtotal salaried personnel</i>	0.00	0.00	0.00	0.00	0.00
Program Expenses					
Marketing					0.00
Supplies					0.00
Equipment					0.00
Catering					0.00
Travel					0.00
<i>Subtotal direct expenses</i>	0.00	0.00	0.00	0.00	0.00
Sub-total Expenses	0.00	0.00	0.00	0.00	0.00
Indirect Costs/Administrative @ 10%	0.00	0.00	0.00	0.00	0.00
Total Expenses	0.00	0.00	0.00	0.00	0.00
INCOME					
Registration Fees					0.00
Tuition					0.00
Grants					0.00
Total Income					0.00
Total Requested from the _____ (Funder/Grantmaker)					

Budget prepared by (Name), (Title), (email), (Telephone number)

Appendix C: Grant Routing Approval Form

Project Director or PI(s):	
Department/Unit:	
Project Title:	
Proposed Funder:	
Brief project description:	
Does this project involve research?	Yes ____ No ____
Does project involve research with human subject or animals?	Yes ____ No ____
Has research been approved by IRB or IACUC?	Yes ____ No ____
Budget Requested:	\$ _____ over <u>X</u> Years
Fontbonne Match Required?	Yes ____ No ____ If yes, how much \$
Will Fontbonne need to find continuation/sustained funding?	Yes ____ No ____ If yes, how much \$
Does the project propose a new academic program?	Yes ____ No ____ Explain:
Does the project propose buy-out of faculty time?	Yes ____ No ____ Explain:
Submission Deadline:	
Date notification anticipated (if known):	
Required Approval/Signatures: <i>The Director of Grants will assist with collecting appropriate signatures of approval.</i>	PI: <i>Signature and Date</i> Comments:
	Department Chair: <i>Signature and Date</i> Comments:
	College Dean: <i>Signature and Date</i> Comments:
	VP for Academic Affairs <i>Signature and Date</i> Comments:

	VP for Finance/CFO: <i>Signature and Date</i> Comments:
	Director of Grants: <i>Signature and Date</i> Comments:

Please return signed form with full grant/proposal to Director of Grants in Ryan Hall 202. Completed copies will go to: Proposal Director(s), Dept. Chairperson, VP for Academic Affairs (or supervising VP), VP for Advancement, and VP for Finance/CFO.

Appendix D: Post-Award Checklist

- _____ Award letter received
- _____ Notifications sent by the Director of Grants to the following:
 - _____ PI
 - _____ VP Advancement
 - _____ Dept. Chair
 - _____ VP Enrollment Management/Marketing & Comm.
 - _____ Finance Office
 - _____ VP Academic Affairs
 - _____ President
 - _____ Senior Director of Advancement Services
- _____ Grant Agreement or contract reviewed and approved by the following:
 - _____ Finance Office
 - _____ VP Academic Affairs
 - _____ Director of Grants/VP Advancement
 - _____ PI
- _____ Award is accepted; Director of Grants or VP Advancement signs grant agreement as official University signatory and returns to funder, unless President and/or Board of Trustees signature(s) are required by funder.
- _____ Director of Grants works with PI, VP Enrollment Management/Marketing & Comm. and Dean to develop internal and external announcements.
- _____ PI in collaboration with the Finance Office prepares a Grant Summary outlining grant terms/conditions (ex: final budget, money transfer method, name of person managing funds)
- _____ For federal grants, a meeting scheduled with the following to discuss and agree on project implementation, grant requirements and cash management:
 - _____ Director of Grants
 - _____ PI
 - _____ VP Finance/CFO
 - _____ Dean
 - _____ Dept. Chairperson
 - _____ Dept. Administrative Assistant or designee
- _____ Finance Office sets up fund.
- _____ Grant funds received and processed. If funder payments are made by cost reimbursement, PI will work with Finance Office to manage this process.
- _____ Stewardship and Reporting
 - _____ Director of Grants calendars all grant report deadlines.
 - _____ PI checks in with the Director of Grants quarterly to ensure project is on track and sends brief updates and/or requests for modifications to funder.
 - _____ Director of Grants sends one reminder and reporting requirements to PI, Dean and Finance Office prior to report deadlines.
 - _____ If a no-cost extension is required, Director of Grants will request of funder or approve PI to do so.
 - _____ PI completes narrative portion of report.
 - _____ PI submits finalized report is for approval to Finance Office and Director of Grants a minimum of 5 days prior to funder's due date
 - _____ Director of Grants submits interim and final reports to the funder and schedules site visits, if appropriate.

Appendix E: Time and Effort Reporting Policy

In accordance with the Office of Management and Budget (OMB) 2 CFR, Chapter I, Chapter II, Part 200, et al., *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, all employees funded by federal grants, both directly and as a component of cost-share, are responsible for making certain that their monthly reported distribution of payroll represents 100% of the compensation received from the University and is an accurate representation of the proportional efforts expended on all compensated activities during the year, including sponsored projects.

Time and Effort reports must be completed by each Fontbonne employee whose time is partially or fully committed to a Federally Sponsored Project on a monthly basis. Reporting is required regardless of whether the time is paid by the sponsor or is an unpaid contribution to be used as a cost share match.

Fontbonne uses an “after the fact” effort reporting system to certify that salaries charged or cost shared to Sponsored Projects are reasonable and consistent with the work performed.

All Time and Effort Report forms are requested to be signed by the employee and certified by a responsible person with suitable means of verification that the work was performed.

The federal government can impose penalties and funding disallowances as a result of missing, inaccurate, incomplete or untimely effort reporting; therefore, Fontbonne University expects that the Grant Administrator will make certain reports are completed in an accurate and timely manner.

Appendix F: Effort Reporting Form

Federal regulations require certifications for all employees whose salaries are charged to federally sponsored programs. In order for the organization to comply with this “time and effort reporting” requirement, each employee working on a federal grant needs to complete this form by the end of each payroll period. This is required monthly by the University. Any requirements or restrictions of the funder should be followed in addition to the University policy.

NAME:	
POSITION/TITLE:	
COLLEGE:	
DEPARTMENT:	
DATES OF COVERAGE:	

Provide a breakdown of your responsibilities for the time period. **The total must equal 100%.** Please use additional sheets as necessary.

GRANT ACCOUNT/FUND #	AMOUNT CHARGED	ACTUAL EFFORT (%)	START DATE	END DATE

UNIVERSITY ACCOUNT/FUND #	AMOUNT CHARGED	ACTUAL EFFORT (%)	START DATE	END DATE

Total effort must equal 100%. I certify that the information provided is correct.

Employee Signature: _____ Date: _____

Supervisor Signature: _____ Date: _____

Signed forms must be returned to the VP for Finance/CFO, Ryan Hall, second floor.

Appendix G: Cost Transfer Policy and Procedure

DEFINITIONS:

A **cost transfer** is an after-the-fact reallocation of a cost, for personnel or non-salary, to a grant or contract within a 120 calendar day period from the accounting date of transaction.

POLICY:

The transfer of expenses must be explained by the submission of supporting documentation that includes how the error occurred and how it was discovered.

Extensive supporting documentation may be required for transfers older than 90 days, or occurring during the last month of the award, or after the award has expired. Frequent errors in the documentation of costs may show a need for evaluating the internal accounting control systems for the department or unit administering the grant. Cost transfers to move unallowable charges to allowable charges to spend funds is not permissible.

Examples of permissible cost transfers:

- Correction of a clerical error
- Reallocation of shared resource cost
- Transfer of pre-award costs from a project/program fund to a grant or contract fund
- Reallocation of salary expense

Examples of a late cost transfer (90 days or older) may include:

- Reallocation of expenses because the grant has unspent funds
- Reallocation of expenses because the clerical error was not noticed within the 90-day period or at a quarterly budget meeting

PROCEDURE:

For cost transfers involving salaries, a Personnel Change Notice form must be submitted to the VP for Finance/CFO. Non-personnel cost transfers should be submitted using the Departmental Requisition form.

The Principal Investigator (PI) must sign all forms. A justification including 1) how the error occurred, and 2) how the error was discovered is required. Justification is required -- include what the department or unit will do to avoid errors in the future.

The PI is responsible for ensuring proper monitoring and compliance of grant and contract activities. This includes compliance with federal regulations, timely corrections of errors, and proper allocation of expenses.

All cost transfers must be approved by the PI, Department Chairperson, Director of Grants and VP for Finance/CFO. In some cases, additional university representatives will be asked to review and approve a cost transfer.

Cost transfers should be reviewed and approved within 120 days of discovery. Cost transfers should be discussed and reviewed at quarterly budget and expenditure monitoring meetings.

Appendix H: Allowable Costs on Grants and Contracts

Allowable Costs

Allowable costs are costs that can be charged to the grant or used as match. Allowable and unallowable costs vary by grant program and funding source. At any time there is a question, the VP for Finance/CFO or the Director of Grants in Advancement should be contacted.

Generally a cost is allowable if it is incurred through work activities that are

- a) Necessary for producing the outcomes described in the grant agreement/work plan and,
- b) Occur during the grant period. Expenses incurred before the grant is executed, or after expiration, are not allowed. Any exception, must be approved by the Director of Grants, VP for Finance/CFO, and the Department Chairperson.

Allowable costs include but are not limited to:

1. Staff Time

The salary, benefits, and leave for staff are allowable if necessary to activities funded by the grant and supported by time and effort documentation. Staff time must be charged directly to the grant program(s) that align with appropriate activities.

Examples of staff activities:

- Administration/Coordination
- Education/Information
- Inventory/Mapping
- Monitoring/Data Collection
- Planning and Assessment
- Project Development
- Regulations/Ordinances/Enforcement
- Technical/Engineering Assistance

Not all categories are allowable activities for all grants.

2. Facilities and Administration

“Facilities” are operations and maintenance expenses. “Administration” is a term for general expenses shared across an organization, such as accounting, human resources, and management. The costs of facilities and administration are commonly grouped together as “overhead” costs. Facilities and administration should be included in the billing rate or indirect cost allocation.

Examples of facilities:

- Insurance
- Office Maintenance
- Rent

- Severance packages
- Supervisor expenses
- Unemployment / Worker's Compensation insurance
- Utilities

Facilities and administration (F&A) costs can also include the staff time of support personnel (including the cost of grant oversight) that is not charged directly to the grant, provided that it is directly related to and necessary for grant activities.

Donated Services or Property: The cost or estimated costs of services or property donated to the grant recipient may not be charged to the grant or included in a billing rate or indirect cost allocation (costs that are not actually incurred may not be charged to grants). Non-state donated services or property that can be quantified may be used to meet cost sharing or match requirements.

To the extent feasible, donated services or property contributed as match should be supported by the same standards of documentation as costs charged to the grant.

3. Supplies

Supplies are defined as all property that costs less than the threshold amount for equipment (as it is defined in section 5). Supplies also have a shorter useful life than equipment. Supplies may be charged directly to the grant program(s) that benefit from their use or, if necessary for all grant programs, may be included in the billing rate or indirect cost allocation.

Examples of supplies:

- Office supplies
- Software
- Tools
- Fuel
- Repairs

4. Contractors / Project Costs

The actual costs of construction, professional and technical services, and other goods and services provided by contractors hired by grant recipients or land occupiers are allowable. Contractors / Project Costs must be charged directly to the grant program(s) that benefit from their use.

Examples of contractors / project costs:

- Construction services
- Materials and supplies and incoming freight charges for them
- Signage

5. Equipment and Other Capital Expenditures

Equipment is defined as property having a useful life of more than one year that costs more than a certain threshold amount. A grant recipient may establish the threshold amount in its own policies. If the grant does not define it, equipment is property with an acquisition cost of \$2,500 or more.

If equipment is already owned by the grant recipient, it is a capital asset.

If equipment is purchased with grant funds to support a program or project funded by the grant, it is a capital expenditure. Capital expenditures to support programs or projects funded by the grant are allowable. If a capital expenditure charged to any one grant exceeds \$10,000, it must receive prior approval. Prior approval may be obtained by including the item to be purchased in

- Principal Investigator (PI) approved initial annual budget, or
- The grant timeline and scope of work.
- If neither option is applicable, Director of Grants, Department Chairperson and Finance Office approval must be requested and received in writing prior to the purchase.

Capital expenditures must be allocated to the program(s) that benefit from their use. Capital expenditures are allowable only as direct costs. They may not be included in a billing rate or indirect cost allocation.

If equipment purchased with Fontbonne grant funds is no longer needed for the original purpose, it may be used to support other comprehensive plan activities.

Charging Grants for Capital Assets, or Equipment Already Owned: Capital assets are defined as tangible and intangible assets having a useful life of more than one year, the cost of which is spread out over a period of time. Charges for capital assets already owned by the grant recipient that are necessary to support programs or projects funded by the grant are allowable costs to grants, but those costs must be properly allocated to reflect the asset's actual use.

To allocate the cost of capital assets directly to program(s) benefitting from their use, the depreciation method may be used. Capital assets should be depreciated using straight-line depreciation unless justification can be provided that use will vary from the early to later portions of the asset's life. The depreciation method should reflect the pattern of use.

Depreciation amounts are also allowable as indirect costs in a billing rate (as a facilities cost) or indirect cost allocation.

When the depreciation method is administratively burdensome, a use allowance for the capital asset may be established. Use allowances should be calculated by evaluating actual costs over a period of time. The basis for an allowance can also be previously established rates such as the IRS established business standard mileage rate.

If a combination of local and state funds were used to purchase the item, the use allowance must deduct the acquisition cost previously charged to the state.

Examples of capital assets:

- Buildings
- Vehicles (pickup, SUV, car)
- Additions or improvements to capital assets that materially increase their value or useful life (not ordinary repairs and maintenance).

Examples of use allowances:

- IRS established business standard mileage rate
- IRS established business standard mileage rate less the portion of the business standard rate treated as depreciation if the asset was acquired with state funds
- Actual expenses sampled over time, and divided by miles, hours, square feet, etc. during the sampled time frame
- For buildings owned by the grant recipient, a market rate for an equivalent rental space in the area the building is located may be used as a use allowance, and included (like rent) as a facilities cost in a billing rate or indirect cost allocation.

Unallowable Costs

Costs that are unallowable to be charged to grants include but are not limited to:

- Bad debts, late payment fees, and investment management fees
- Giving donations and fundraising
- Entertainment, gifts, prizes and decorations
- Food (other than the standard per diem, or as included in the costs of meetings and conferences where the primary purpose is training)
- Lobbying, lobbyists and political contributions
- Merit awards and bonuses
- Alcoholic beverages

If an unallowable cost is incorrectly posted, it is immediately reclassified to the department budget upon discovery.

Grant recipients can use Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, Part 200 of Title 2 of the Code of Federal Regulations, for further guidance on allowable grant expenditures. This guidance provides generally accepted standards for allowable costs. See <http://www.ecfr.gov>. For further details consult with your Director of Grants in Advancement or the VP for Finance/CFO.

Resources

- Government Finance Officers Association: Determining the Estimated Useful Lives of Capital Assets <http://www.gfoa.org/determiningestimated-useful-lives-capital-assets>
- IRS Standard Mileage Rates <https://www.irs.gov/tax-professionals/standard-mileage-rates>

Appendix I: Participant Support Policy

PURPOSE

Federal and non-federal agencies provide support for a variety of sponsored projects, including research, training and public service. An agency may fund a project whose aim is to sponsor outreach programs to bring experts together to discuss research or education findings or to expose other researchers or students to new research and education techniques. To cover the associated costs, the sponsor may include a category of expenses generally referred to as Participant Support Costs. Specifically, Participant Support Costs as defined in the Uniform Guidance (2 CFR200.75) are “direct costs for items such as stipends or subsistence allowances, travel allowances, and registration fees paid to or on behalf of participants or trainees (but not employees) in connection with conferences, or training projects.” This policy sets forth the particular requirements that apply to Participant Support Costs.

APPLICABILITY

This policy applies to all sponsored programs (federal, state, industry and private) and all Principal Investigators, Co-Principal Investigators, senior personnel, faculty and administrators who are seeking to obtain external funding for Participant Support Costs.

DEFINITIONS

Participant Support Costs are those costs paid to, or on behalf of, participants or trainees (but not employees) in meetings, conferences, symposia, and workshops when there is a category for Participant Support Costs in the award budget. Participant Support Costs may include registration fees, travel allowances, manuals and supplies, tuition, stipends and other costs associated with supporting the cost of attendance at these events. Participant Support Costs pertain only to those projects that are funded specifically for the purpose of supporting the meetings themselves; costs associated with general travel and similar costs incurred on other grants, even when related to attendance at conferences or meetings that bring people together for professional exchange, are classified as travel costs on those individual awards and are not Participant Support Costs.

POLICY

In order to include Participant Support Costs on sponsored projects, applicants and awardees must receive prior approval from the sponsor. Participant Support Costs are generally granted for specific projects, and agencies may restrict their use to specific programs. Indirect costs (F&A) are not provided on participant support costs and must be excluded when calculating the Modified Total Direct Cost (MTDC) base on a federally sponsored project.

If a federal sponsor awards such participant support costs, the following apply:

- The sponsor will not allow re-budgeting from the Participant Support Cost category into other expense categories without prior approval.
- Responsible Office: Finance and Advancement

- Any additional categories of Participant Support Costs other than those described in the Uniform Guidance 2 CFR Part 200.75 must be justified in the budget justification, and such costs will be closely examined for adherence to sponsor requirements.
- The University must return any unexpended Participant Support Costs to the sponsor.

When a sponsored project includes Participant Support Costs, the Principal Investigator and administrative support personnel are required to be familiar with the specific requirements as set forth by the sponsor and to ensure compliance with those requirements. Evidence of attendance of participants in the form of daily logs or similar documentation must be maintained within the project's records.

DOCUMENTS

For further information on Participant Support Costs, and NSF proposals for conferences, symposia and workshops that support Participant Support Costs, please refer to www.nsf.gov/pubs/policydocs/pappguide/nsf16001/gpg_2.jsp.

CROSS REFERENCE This policy is created in order to comply with OMB Uniform Guidance 2 CFR Parts 200.68, 200.75, 200.308 (c)(5), and 200.456.

APPENDIX 2.2.2 TUBERCULOSIS POLICY: GLOSSARY OF TERMS

Chest x-ray: A chest X-ray is a picture of the chest that shows your heart, lungs, airway, blood vessels, and lymph nodes.

Local health department: St. Louis County Health Department

Latent Tuberculosis Infection (LTBI): a condition in which a person is infected with *Mycobacterium tuberculosis*, but does not currently have active **tuberculosis** disease.

Matriculation: to become a student at a school usually in a college or university.

***Mycobacterium tuberculosis*:** pathogenic bacterial species and the causative agent of most cases of tuberculosis (TB).

Registration hold: notation on a student's account preventing action on the student's account such as registration for classes.

Risk Screening: questionnaire presented to students, faculty and staff regarding tuberculosis history to determine whether there is any potential exposure to tuberculosis presented by the student or employee.

Tuberculosis: commonly known as TB, is a bacterial infection that can spread through the lymph nodes and bloodstream to any organ in your body but is most often found in the lungs. While most people who are exposed to TB never develop symptoms because the bacteria can live in an inactive form in the body, TB bacteria can become active. In an active state, TB bacteria cause death of tissue in the organs they infect and can be fatal if left untreated.

Tuberculin skin test: A tuberculin skin test (also called a Mantoux tuberculin test) is done to by putting a small amount of TB protein (antigens) under the top layer of skin on your inner forearm. If you have ever been exposed to the TB bacteria (*Mycobacterium tuberculosis*), your skin will react to the antigens by developing a firm red bump at the site within 2 days.

The TB antigens used in a tuberculin skin test are called purified protein derivative (PPD). A measured amount of PPD in a shot is put under the top layer of skin on your forearm. This is a good test for finding a TB infection. It is often used when symptoms, screening, or testing, such as a chest X-ray, show that a person may have TB.

APPENDIX 2.3.3.1.1 CAMPUS CRIME REPORT FORM
FONTBONNE UNIVERSITY CAMPUS CRIME REPORT

DATE OF INCIDENT: _____

DATE OF REPORT: _____

NATURE OF INCIDENT AND DISPOSITION _____

LOCATION OF INCIDENT (IF BRANCH CAMPUS, PLEASE SPECIFY) _____

NAMES OF FONTBONNE STUDENTS OR EMPLOYEES INVOLVED: _____

NAMES OF NON-FONTBONNE PERSONS INVOLVED: _____

WERE THE POLICE OR OTHER SECURITY OFFICERS INFORMED OF THIS INCIDENT? YES___ NO ___

IF SO, PLEASE STATE THEIR NAMES? _____

NAME OF PERSON MAKING THIS REPORT: _____

This form is used for compliance with the Crime Awareness and Campus Security Act of 1990 (PL 101-542). As required by the Department of Education, crimes statistics must be compiled and submitted to the Department of Education annually for: (1) murder, (2) rape, (3) robbery, (4) aggravated assault, (5) burglary, (6) motor vehicle theft, (7) liquor law violations, (8) drug abuse violations, (9) weapons violations and (10) any crime where a person is injured. A security log must be maintained and open for inspection for all reported incidents.

Please return completed forms to:

Fontbonne University
Director of Public Safety
6800 Wydown Blvd.
St. Louis, MO 63105

APPENDIX 2.7.1.1 ESSENTIAL ELEMENTS OF THE CONSENT FORM

The following information shall be provided to each subject in seeking informed consent:

1. An explanation of the purposes of the research including the expected duration of the subject's participation, a description of all procedures and the identification of any procedures that are experimental.
 2. A description of any foreseeable risks or discomforts to the subject.
 3. A description of any benefits to the subject or to others which may reasonable be expected from the research.
 4. A statement describing the extent to which confidentiality of records identifying the subject will be maintained.
 5. An explanation of whom to contact for answers to pertinent questions about the research and research participants' rights, and whom to contact in the event of a research-related injury to the subject.
 6. A statement that participation is voluntary, refusal to participate will involve no penalty or loss of benefits to which the subject is otherwise entitled, and the subject may discontinue participation at any time without penalty or loss of benefits to which the subject is otherwise entitled.
-

Sample Consent Form

You are invited to participate in a study of (*state what is being studied*). We hope to learn (*state what the study is designed to discover or establish*). You were selected as a possible participant in this Study because (*state why and how the subject was selected*).

If you decide to participate, we (or: ____ and associates) will (*Describe the procedures to be followed, including their purposes, how long they will take, and their frequency. Describe the discomforts and inconveniences reasonably to be expected, and estimate the total time required. Describe the risks reasonably to be expected, and any benefits reasonably to be expected.*)

(*If applicable, describe appropriate alternative procedures that might be advantageous to the subject, if any. Any standard treatment that is being withheld must be disclosed.*)

Any information obtained in connection with this study that can be identified with you will remain confidential and will be disclosed only with your permission. In any written reports or publications, no one will be identified or identifiable and only aggregate data will be presented. (*If you will be releasing information to anyone for any reason, you must state the persons or agencies to whom the information will be furnished, the nature of the information to be furnished, and the purpose of the disclosure.*)

(*If the subject will receive compensation, describe the amount or nature. If there is a possibility of additional costs to the subject because of participation, describe it. If there is a possibility of a research-related physical injury, information as to the medical treatment and compensation available should be included.*)

Your decision whether or not to participate will not affect your future relations with the (*institution or agency*) in any way. If you decide to participate, you are free to discontinue participation at any time without affecting such relationships.

If you have any questions, please ask us. If you have any additional questions later, (*name and phone number*) will be happy to answer them.

You will be offered a copy of this form to keep.

You are making a decision whether or not to participate. Your signature indicates that you have read the information provided above, have had your questions answered, and you have decided to participate. You may withdraw at any time without prejudice after signing this form should you choose to discontinue participation in this study.

Signature

Date

Signature of Parent or Legal Guardian
(*Include this line if applicable*)

Date

Signature of Investigator

Date

APPENDIX 2.7.1.4.1.1 REQUEST FOR APPROVAL OF THE USE OF HUMAN PARTICIPANTS IN RESEARCH

SCREENED FOR EXEMPT STATUS FORM

University and Federal policies require that each project involving studies on humans be reviewed to consider: 1) the rights and welfare of the individual(s) involved, 2) the appropriateness of the methods used to secure informed consent, and 3) the risk and potential benefits of the investigation.

The following information is necessary for this review. All researchers must complete research ethics training and provide documentation of completion with review requests.

Complete each item as applicable. If an item is not applicable, indicate this by "NA."

Institutional Review Board for the Protection of Human Subjects in Research
Office of the Vice President for Academic Affairs
304 Ryan Hall, Fontbonne University
6800 Wydown Boulevard
St. Louis, MO 63105

Complete this form and submit electronically to: yfarmer@fontbonne.edu

Principal Investigator: _____

Phone Number: _____

Mailing Address: _____

Email Address: _____

Project Title: _____

Academic Department: _____

Proposed Starting Date: _____

This study is covered under the exemption category for the following reason(s): (check all that apply)

1.____ This study will be conducted in an established or commonly accepted educational setting involving normal educational practices.

2.____ This study involves the use of educational tests and participants cannot be identified.

3.____ This study involves surveys and/or interview procedures or observations of public behavior and

- a. _____ participants cannot be identified, either directly or through the identifiers _____ linked to the subject.
 - b. _____ the participants' responses, if they become known outside the research, cannot _____ place the participants at risk of criminal or civil liability or be damaging to the _____ participants' financial standing or employability.
 - c. _____ the research does not deal with sensitive aspects of the participants' own behavior.
4. _____ Participants are 18 years of age or older.
 5. _____ This study involves the use of existing data.
 6. _____ This study is an evaluation of Federal Research and/or Federal program(s).

PARTICIPANTS:

Age Range _____ Number of Participants _____

Specify how participants are to be chosen. Enclose a copy of the consent form to be used. This should ordinarily be the Fontbonne University form. Attach an explanation for use of a different form.

ABSTRACT/SHORT DESCRIPTION OF STUDY:

Clearly state the purpose of the study (hypothesis) in which human participants will be involved. Specify what will be done to or for the participants (beyond information in the consent form.) Remember that research data can only be reported in aggregate or in a form which protects the confidentiality of research participants.

- Attach an outline of your research design and methodology to this form.
- Attach any questionnaires that will be used in your research project (unless subject to copyright restriction)

PROTECTING HUMAN RESEARCH PARTICIPANTS ETHICS TRAINING

_____ YES, I have completed the online NIH Protecting Human Research Participants course and

_____ I have attached a copy of my certification of completion or

_____ I have completed the course within the past three years and my certification of completion is on file with the Office of Academic Affairs

Signature of Principal Investigator

Date

Signature of Faculty Research Advisor (if applicable)

Date

Faculty Advisor's Phone Number

Faculty Advisor's Email Address

**RESEARCH SHOULD NOT BE INITIATED UNTIL YOU HAVE RECEIVED
CONFIRMATION OF EXEMPTION**

IRB CHAIR USE ONLY:

My signature below signifies this research proposal has been reviewed and approved by the IRB Committee.

IRB Chair:

Date: _____

IRB Approval Number: FBUIRB-XXXXXX-XX

Approval Expires: _____

Adopted November, 1993

EXPEDITED OR FULL REVIEW FORM

University and Federal policies require that each project involving studies on humans be reviewed to consider: 1) the rights and welfare of the individual(s) involved, 2) the appropriateness of the methods used to secure informed consent, and 3) the risk and potential benefits of the investigation.

The following information is necessary for this review. All researchers must complete research ethics training and provide documentation of completion with review requests. Complete each item as applicable. If an item is not applicable, indicate this by "NA."

Institutional Review Board for the Protection of Human Subjects in Research
Office of the Vice President for Academic Affairs
304 Ryan Hall, Fontbonne University
6800 Wydown Boulevard
St. Louis, MO 63105

Complete this form and submit electronically to: yfarmer@fontbonne.edu

This proposal is submitted for:

Expedited Review _____

Full Review _____

Principal Investigator: _____

Phone Number: _____

Mailing Address: _____

Email Address: _____

Project Title: _____

Academic Department: _____

Proposed Starting Date: _____

Proposal has been (will be) submitted to funding agency (check N/A or give agency and date):

____ N/A _____

Name and address of person(s) at funding agency and/or university who should receive notice of IRB approval (other than investigator):

____ N/A _____

____ N/A _____

PARTICIPANTS

Age Range _____ Number of Participants _____

Specify how participants are to be chosen. Enclose a copy of the consent form to be used. This should ordinarily be the Fontbonne University form. Attach an explanation for use of a different form.

ABSTRACT/SHORT DESCRIPTION OF STUDY

Clearly state the purpose of the study (hypothesis) in which human participants will be involved. Specify what will be done to or for the participants (beyond information in the consent form.) Remember that research data can only be reported in aggregate or in a form which protects the confidentiality of research participants.

- Attach an outline of your research design and methodology to this form.
- Attach any questionnaires that will be used in your research project

PROTECTING HUMAN RESEARCH PARTICIPANTS ETHICS TRAINING

_____ YES, I have completed the online NIH Protecting Human Research Participants course and

_____ I have attached a copy of my certification of completion or

_____ I have completed the course within the past three years and my certification of completion is on file with the Office of Academic Affairs

Signature of Principal Investigator

Date

Signature of Faculty Research Advisor (if applicable)

Date

Faculty Advisor's Phone Number

Faculty Advisor's Email Address

RESEARCH SHOULD NOT BE INITIATED UNTIL YOU HAVE RECEIVED A NOTICE OF APPROVAL

IRB CHAIR USE ONLY:

My signature below signifies this research proposal has been reviewed and approved by the IRB Committee.

IRB Chair:

Date: _____

IRB Approval Number: FBUIRB-XXXXXX-XX

Approval Expires: _____

Expedited review status will be reviewed by at least three of the Institutional Review Board members. The Principal Investigator shall be notified of the Institutional Review Board decision within three weeks. If applicable, a copy of the decision will be emailed to the faculty advisor.

Full review status requests will be reviewed during meetings of the Institutional Review Board at which a quorum is present. A majority of the Institutional Review Board must approve the proposal. The researcher shall be notified of the Institutional Research Review Board decision within four weeks. If applicable, a copy of the decision will be emailed to the advisor.

Appendix 2.7.1.4.1.2 EXPEDITED REVIEW GUIDELINES

Fontbonne IRB Expedited Review Guidelines

Proposals for Research with Human Participants may be expedited and not subject to full review procedures when what is being proposed does not expose participants to risk either to their persons or to their privacy.

The same materials must be submitted for an expedited review as for a full review. The only difference is the length of time required for the review and the number of IRB members who will review the proposal.

Examples of expedited review procedures include:

1. Research on individual or group behavior or characteristics of individuals such as studies of perception, cognition, game theory, or test development, where the investigator does not manipulate participants' behavior and the research will not involve stress to subjects.
2. Recording of data from participants 18 years of age or older using non-invasive procedures routinely employed in clinical practice. This includes the use of physical sensors that are applied either to the surface of the body or at a distance and do not involve input of matter or significant amounts of energy into the participant or an invasion of the participant's privacy. It also includes such procedures as weighing, testing sensory acuity, electrocardiography, electroencephalography, thermography, detection of naturally occurring radioactivity, diagnostic echography, and electroretinography. It does not include exposure to electromagnetic radiation outside the visible range (for example, X-rays, microwaves).
3. Voice recording made for research purposes such as investigations of speech defects.
4. Moderate exercise by healthy volunteers.
5. The study of existing data, documents, records, pathological specimens, or diagnostic specimens.
6. Collection of hair and nail clippings, in a non-disfiguring manner, deciduous teeth, and permanent teeth, if patient care indicates a need for extraction.
7. Collection of excreta and external secretions including sweat, uncannulated saliva, placenta removed at delivery, and amniotic fluid at the time of rupture of the membrane prior to or during labor.
8. Collection of blood samples by venipuncture, in amounts not exceeding 450 milliliters in an eight-week period and no more often than two times per week, from participants 18 years of age or older and who are not pregnant.
9. Collection of both supra- and subgingival dental plaque and calculus provided the procedure is not more invasive than routine prophylactic scaling of the teeth and the process is accomplished in accordance with accepted prophylactic techniques.
10. Research on drugs or devices for which an investigational new drug exemption or an investigational device exemption is not required.

Revised August 2018

APPENDIX 2.8.1.1 DRIVER CONTRACT AND ACTIVITY/TRIP APPROVAL FORM



Driver Contract and Activity/Trip Approval Form

Sponsors must complete and submit this Driver Contract and Activity/Trip Approval Form to their Vice President at least three working days prior to the day of departure.

Indicate below the type and number of vehicles to be used for the trip.

University-Rented Vehicles _____ Privately Owned Vehicles _____

Sponsor: _____ Dept: _____ Tel/Ext: _____

Destination: _____ Departure Date: _____ Return Date: _____

Activity/Trip Description: _____

Printed Name of Driver		ID#	Driver's Signature		Driver is Approved	

Public Safety Officer's
Signature Indicating

The activity/trip sponsor will ensure that all drivers know and agree to abide by the Fontbonne University transportation policies and procedures.

Sponsor's Signature: _____ Vice President Approval: _____

APPENDIX 2.8.1.2.1 DRIVING RECORD RELEASE FORM



AUTHORIZED DRIVER DRIVING RECORD RELEASE FORM

All information must be completed before further processing. Please print clearly.

List below the name and telephone number of the driver's sponsor (supervisor or the individual requesting the driver be authorized to operate a vehicle):

Sponsor's Name: _____ **Telephone/Extension Number:** _____

Driver's Fontbonne ID # _____

Driver's Last Name: _____

Driver's First Name & Middle Initial: _____

Driver's Birth date (m/d/y): _____ **Driver's Social Security #** _____

Driver's License Number: _____ **State Issued:** _____

Attach copy of driver's license in the space provided below:

The signature below authorizes Fontbonne University to request a driving record reference check from the state in which driver is licensed to drive. This authorization expires 60 days after the date on this form and approval to drive must be renewed annually. By signing, I also acknowledge that I have received the University's transportation policy.

Signature: _____

Date: _____

APPENDIX 2.8.1.3.1.1 ACCIDENT REPORT FORM



ACCIDENT REPORT FORM

UNIVERSITY-RENTED VEHICLE _____ PRIVATELY-OWNED VEHICLE _____

Date _____

Time _____

Location _____

Police Department/Officers Responding

Department _____ Telephone Number _____

Address _____

Officer's Name _____ Police Report Number _____

Fontbonne Driver Information

Name _____ ID Number _____

Other Driver Information

Name _____ Telephone Number _____

Address _____

License Plate Number _____ State _____

Insurance Company _____ Telephone Number _____

Agent's Name _____ Policy # _____

Briefly Describe What Happened _____

ACCIDENT REPORT FORM

Page 2

Witness and Injury Information

Witness ☐ Injured ☐ Name _____

Address _____

City _____ State _____ Zip _____

Telephone Number (____) _____

Witness ☐ Injured ☐ Name _____

Address _____

City _____ State _____ Zip _____

Telephone Number (____) _____

Witness ☐ Injured ☐ Name _____

Address _____

City _____ State _____ Zip _____

Telephone Number (____) _____

Witness ☐ Injured ☐ Name _____

Address _____

City _____ State _____ Zip _____

Telephone Number (____) _____

Witness ☐ Injured ☐ Name _____

Address _____

City _____ State _____ Zip _____

Telephone Number (____) _____

Witness ☐ Injured ☐ Name _____

Address _____

City _____ State _____ Zip _____

Telephone Number (____) _____

Return a copy of this form to the Vice President for Finance and Administration

APPENDIX 2.8.1.4.1 EMERGENCY REPAIRS AND TOWING REPORT FORM



Fontbonne University
Learn more. Be more.

EMERGENCY REPAIRS and TOWING REPORT FORM

Vehicle Number _____ Mileage _____ Date _____ Time _____

Name of Vehicle Driver _____

Tow Information

Towing

Company _____

Address _____

City, State, Zip _____

Telephone _____

Number _____

Location Towed _____

Address _____

City, State, Zip _____

Telephone _____

Number _____

Reason for Tow _____

Cost of Tow* _____

Repair Information

Repair Shop _____

Address _____

City, State, Zip _____

Telephone _____

Number _____

Type of Repairs _____

Cost of Repairs* _____

Name of Driver Authorizing Repairs or Towing _____

Signature of Driver Authorizing Repairs or Towing _____

*All invoices should be attached to this form